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ABSTRACT

This document reports the findings of the National Study of Local Operations under Chapter 2 of the Education Consolidation and Improvement Act of 1981, the federal education block grant, concerning the legislation's effects on the provision of services to private school students. Data for the report came from national mail and telephone surveys and from site visits to school districts and private schools in eight states. An introductory chapter reviews the history of the involvement of private school students in federal programs, notes changes brought about by the block grant, and describes the methodology of the aspect of the study reported here. The second chapter presents a descriptive profile of local practices under Chapter 2, focusing on fund allocation, services, administration, and the level of participation of private school students. The four remaining chapters in the body of the report address specific individual issues: the nature of private school students' access to services, the equality of per pupil expenditures, the equitability of services, and the administration of the aspect of the grant program aimed at private school students. A concluding chapter assesses the costs and benefits of the participation of private school students from the perspectives of both public and private schools. Appendixes provide error values for the tables accompanying the text and a list of the antecedent programs consolidated into the Chapter 2 block grant. (PGD)

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PARTICIPATION OF PRIVATE SCHOOL STUDENTS IN SERVICES SUPPORTED BY THE EDUCATION BLOCK GRANT

A Special Issue Report from the National Study of Local Operations Under Chapter 2 of the Education Consolidation and Improvement Act

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January 1986

Rhonda Ann Cooperstein, SRI International

Prepared for:

U.S. Department of Education,
Office of Planning, Budget, and Evaluation
Washington, D.C. 20202

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The conclusions of this report are those of the authors and contractors and do not necessarily reflect the views of the U.S. Department of Education or any other agency of the government.

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Reports from the National Study of Local Operations under Chapter 2

Michael S. Knapp Craig H. Blakely	The Education Block Grant at the Local Level: The Implementation of Chapter 2 of the Education Consolidation and Improvement Act in Districts and Schools
Michael S. Knapp	Legislative Goals for the Education Block Grant: Have they been Achieved at the Local Level
Richard Apling Christine L. Padilla	Funds Allocation and Expenditures under the Education Block Grant
Rhonda Ann Cooperstein	Participation of Private School Students in Services Supported by the Education Block Grant
Craig H. Blakely Marian S. Stearns	Involvement of Parents and Citizens in Local Decisionmaking Under the Education Block Grant
Brenda J. Turnbull Ellen L. Marks	The Education Block Grant and Intergovernmental Relations: Effects at the Local Level
Elizabeth R. Reisner Michael S. Knapp	State and Local Evaluation Options Under the Federal Education Block Grant

CONTENTS

Preface vii
Acknowledgments ix
Notes for Reading Tables xi

I INTRODUCTION . . . 1
- History of Involvement of Private School Students in Federal Programs . . . 1
- Changes Since the Block Grant . . . 5
- Research Questions . . . 6
- Methods and Data Sources . . . 7
- Organization of the Report . . . 11

II DESCRIPTIVE PROFILE OF LOCAL PRACTICES UNDER CHAPTER 2 . . . 13
- Participation of Private School Students . . . 13
- Local Allocation of Chapter 2 Funds for Services to Private School Students . . . 18
- Services for Private School Students . . . 20
- Administrative Practices . . . 25
- Summary . . . 36

III ACCESS TO SERVICES . . . 39
- Changes in Private School Student Participation With the Block Grant . . . 39
- Nonparticipants in Chapter 2 . . . 44
- Is Access Equitable? . . . 47
- Summary . . . 49

IV EQUAL PER PUPIL EXPENDITURES . . . 51
- Equality of Expenditures . . . 51
- Interpretation of Allocation Requirements That May Result in Unequal Expenditures . . . 54
- Factors Leading to Equal Per Pupil Expenditures . . . 60
- Consequences of Fiscal Equality. . . . 61
- Summary . . . 64

V EQUITABLE SERVICES . . . 67
- Comparison of Services for Private and Public School Students . . . 68
- Appropriateness of Services . . . 71
- Changes in Equitability with the Block Grant . . . 79
- Summary . . . 80

VI ADMINISTRATIVE ISSUES . . . 83
- Consultation with Private School Officials . . . 83
- Complexity and Burden of Administration from the Public School Perspective. . . . 85

CONTENTS (Concluded)

Private School Perspective on the Complexity and Burden of Chapter 2 91
The Quality of the Relationship Between Districts and the Private Schools 92
Summary 96

VII CONCLUSION 101
Issues of Equitable Participation. 101
Administrative Issues. 103
Costs and Benefits from the Public School District Perspective. 103
Costs and Benefits from the Private School Perspective . . . 105
Putting Costs and Benefits in Perspective 107

REFERENCES 109

Appendix A: Technical Notes and Standard Error Values for Tables 111

Appendix B: List of Antecedent Programs 131

TABLES

Section II

Table II-1 Districts with Private Schools that have Students Eligible to Participate in Activities Supported by Chapter 2, By Size of District 14

Table II-2 Districts Serving Private School Students in Activities Supported by Chapter 2, by Size of District 16

Table II-3 Average Number of Private Schools and Private School Students Eligible for, and Participating in, Chapter 2, By Size of District 17

Table II-4 Average Amount of Chapter 2 Funds (and Proportion of District's Chapter 2 Allocation) Available for Services to Private School Students in the 1984-85 School Year, By Size of District 19

Table II-5 Chapter 2 Services to Private School Students, By Size of District 22

Table II-6 District Monitoring of Chapter 2-Supported Services for Students in Private Schools, By Size of District 29

Section III

Table III-1 Change in Numbers of Private Schools with Students Participating in Antecedent Programs Compared With Chapter 2, By Size of District 40

TABLES (Concluded)

Section IV

Table IV-1 Per Pupil Expenditures for Services to Public and Private School Students Under Chapter 2, By Size of District 52

Table IV-2 Disposition of Funds for Services to Private School Students That Do Not Participate in Chapter 2, By Size of District 57

Table IV-3 Change in Proportion of Funds Available to Serve Students in Private Schools, from Antecedent Programs to Chapter 2, By Size of District 63

Section V

Table V-1 Comparison of Services to Public and Private School Students 69

Table V-2 District Guidance to Private School Officials Regarding the Use of Chapter 2 Funds for Their Students 72

Table V-3 Comparison of Chapter 2 Services to Public and Private School Students at Comparable Levels of Funding 77

Section VI

Table VI-1 Burden Associated with Administering Chapter 2 Services for Private School Students, By Size of District 86

Table VI-2 Problems Districts Encounter Administering Services for Private School Students By Size of District 88

PREFACE

This document is one of a series of reports resulting from SRI's National Study of Local Operations Under Chapter 2 of the Education Consolidation and Improvement Act (ECIA). Chapter 2--the first federally supported education block grant--consolidated 32 former categorical programs into a grant of funds to all school districts, to be used for any of the purposes in the preceding programs. The block grant was implemented in school districts across the nation in the 1982-83 school year, following passage of ECIA in 1981.

In response to numerous demands for information about the block grant's implementation and effects from the U.S. Congress, other federal agencies, and interest groups, and in anticipation of its own need to inform debate on reauthorization and appropriations, the U.S. Department of Education (ED) commissioned SRI International, in collaboration with Policy Studies Associates (PSA), in 1983, to study Chapter 2. The two-year investigation was to focus its data collection on the third year of implementation, the 1984-85 school year, although information was also gathered to examine the first two years of Chapter 2 and the year preceding it, the last in which programs consolidated into the block grant were operating.

The SRI study did not take place in a vacuum. For various reasons--among them, the newness of the block grant mechanism in federal education aid, the lack of a formal reporting route from the local to federal levels, the fact that shifting to a block grant format significantly redistributed funds among districts--numerous smaller investigations were mounted by federal agencies (including ED), independent researchers, and others to examine Chapter 2's implementation. This research, which we review in Section I and in other reports, documented various effects, but also left many questions unanswered about the first and second years of implementation and the longer-term perspective.

Building on the foundation laid down by these earlier studies, the SRI investigation had the following purposes:

1. Describe local activities and operations under Chapter 2 in the program's third year, noting changes over the first three years of the program and changes from antecedent programs.
2. Assess the achievement of federal legislative goals, in particular, educational improvement, reduction in administrative burden, and an increase in programmatic discretion at the local level.
3. Describe how the federal block grant mechanism (Chapter 2 funding or guidelines and state actions or interpretations) influences LEA activities.

4. Determine how state and local education agencies evaluate their Chapter 2 programs and develop options so that the Department of Education can offer technical assistance.

5. Draw lessons from Chapter 2 implementation and effects for future federal policies.

To fulfill these purposes and obtain a comprehensive description of local activities and operations under Chapter 2, the study is organized around five major topics. Each of these represents a purpose of the law or a set of issues regarding the block grant mechanism.

- Education service delivery (concerning the nature of education services supported by Chapter 2 and their contribution to education improvement).
- Funds allocation and expenditure (concerning the types of expenditures under Chapter 2 and the influences on local spending).
- Local program administration and decisionmaking (concerning the way in which Chapter 2 is administered and the effect on administration/paperwork burden; the nature of the decision process, including the participation of parents/citizens, and implications for the exercise of local discretion; local evaluation activities).
- Services for private school students (concerning expenditures for services to private school students and the delivery of these services; the administration of these services).
- Intergovernmental relations (concerning the roles and interaction of local, state, and federal levels under Chapter 2).

The results of the study have been reported in three ways:

(1) A comprehensive report, emphasizing descriptive findings in all topic areas and summarizing the analyses in special issue reports.

(2) A series of shorter reports addressing five special issues: services for private school students (the topic of this report), the achievement of legislative goals, the allocation and expenditure of funds, the participation of parents and citizens in decisionmaking, and intergovernmental relations.

(3) An options paper for state and local audiences regarding ways to evaluate activities supported by the block grant.

Titles and authors of all these reports are listed on the back of the title page of this document.

Michael S. Knapp,
Project Director

December, 1985

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A study of this magnitude represents the ideas, energy, and perseverance of many people. We wish to acknowledge their contributions and thank them for their willingness to help the study toward successful completion.

First, we owe much to the patience and support of various state Chapter 2 coordinators, who listened to plans for the study, made suggestions, and encouraged their districts to participate. In particular, those who sat on the Study's Advisory Panel--Weaver Rogers, Darrell Arnold, and Carolyn Skidmore--and the members of the State Chapter 2 Coordinator's Steering Committee deserve special mention.

The findings of our research synthesize the responses of many school and district staff, school board members, parents, private school personnel, and others at the local level. To all who took the time to respond to our questionnaires or answer interview questions, we owe the deepest gratitude--for taking the time from their busy lives to provide information that helps those at a greater distance understand what the block grant contributes to their schools or school districts. Particular school district staff, who advised us during the course of the study, deserve special mention: Todd Endo, Gerald King, Tom Rosica, Ken Tyson, and Alan Osterndorf.

Numerous national associations and interest groups have helped shape the plans for the study, critiqued draft reports, or both, among them: Susan Hennessy, Council of Chief State School Officers (also members of its Committee for Evaluation and Information Systems); Claudia Mansfield, American Association of School Administrators; Marilyn Rauth, American Federation of Teachers; Robert Smith, American Council on Private Education; Joseph McElligott, California Catholic Conference; Michael Casserly, Council of the Great City Schools; Arnold Fege, National Parent Teachers Association; Warlene Gary, National Education Association; John Purcell, Claudia Waller, Roger Sharpe, and Ed Kealy, National School Boards Association; James Jess, Rural Education Association; Anne Henderson, National Committee for Citizens in Education.

In the U.S. Department of Education, individuals in many parts of the agency took an interest in the study and helped focus its questions and approach to research. The Project Officer, Carol Chelemer of the Planning and Evaluation Service in the Office of Planning, Budget, and Evaluation, shepherded the investigation through its various stages with humor, insight, and unwavering support. We much appreciated the contributions of others in the Department, among them: Janice Anderson, Charles Blum, Lois Bowman, Cecil Brown, Lawrence Davenport, Fred Graves, Linda Hall, Gary Hanna, Patricia Jones, Allen King, Stanley Kruger, Patsy Matthews, David Morgan, Kay Rigling, Robert Stonehill, Kenneth Terrell, and Zulla Toney.

In other federal agencies and the U.S. Congress, we found individuals who were insightful about what needed to be studied, how to gather the information, and the ways to present our findings. We wish especially to thank: Mary Kennedy, National Institute of Education; Paul Grishkat, David Bellis, and Frederick Mulhauser, U.S. General Accounting Office; Kathy Burchard, Barry White, Richard O'Brien, and Barbara Young, U.S. Office of Management and Budget; Dan Koretz, Congressional Budget Office; Jack Jennings, Marc Smolonsky, and Richard DiEugenio, congressional staff in the U.S. House of Representatives; Bruce Post and Ann Young, congressional staff in the U.S. Senate.

Colleagues in universities, research firms, and elsewhere contributed wide-ranging technical expertise to the various design and analysis issues confronting the study.

Finally, the dedication and professionalism of the entire study team was the key to making this research successful. Marian Stearns, Director of SRI's Social Sciences Department and Project Director during the study's design phase, deserves special mention for her unflagging enthusiasm and good sense about research on federal aid to education. The author would also like to thank Michael Knapp for his guidance and support in completing this report. Others on the study team, besides the authors of other reports (see back of title page), include these SRI staff: Deborah Jay, Lynn Newman, Debra Richards, Ellen Renneker, Mary Hancock, Kathy Valdes, Ruth Krasnow, Linda Burr, Marion Collins, Carolyn Estey, Elaine Guagliardo, and Klaus Krause. Dan Hagan and the telephone survey staff of Chilton Research Services performed admirably in support of the mail and telephone surveys. Other individuals who worked as field staff helped us gather useful interview information on numerous field visits: Susan Peters, Brian Delaney, Peggy Estrada, Gene Franks, and Steve Thornton.

To all these people, your contributions were much appreciated.

NOTES FOR READING TABLES

Tables in this report are often broken out by district size category, because the enormously skewed distribution of districts nationwide may distort the reader's understanding of national estimates (the large number of small districts, for example, means that most overall estimates are largely a reflection of these). The breakout also enables the reader to appreciate the considerable differences in block grant impact and implementation in districts of different size.

Size categories also comprise differing proportions of the nation's student population. We indicate below the number and percent of districts falling in each size category, as well as the proportion of the nation's students represented.

The "very large" category has been further subdivided into urban districts and suburban county systems (which may include a moderate-sized city as well) because the characteristics and responses of these two types differ substantially.

District size category (enrollment range)	Number (and percent) of districts within range	Proportion of nation's students
Very large (25,000 or greater)	163 (1.0%)	25.8%
Urban	92 (0.6%)	15.8
Suburban	71 (0.5%)	10.0
Large (10,000 to 24,999)	466 (3.0%)	17.3
Medium (2,500 to 9,999)	3,027 (19.5%)	35.1
Small (600 to 2,499)	5,369 (34.6%)	17.9
Very small (Less than 600)	6,508 (41.9%)	3.8
TOTAL	15,533 (100%)	100.0%

Wherever tables are presented without subdivision into these categories, the reader may assume that the differences among categories are statistically insignificant or irrelevant to the analysis in question.

To simplify presentation, tables do not include n's on standard errors. These and accompanying technical notes may be found in Appendix A.

In this report, the data in most tables exclude (1) districts where the private school student component is handled by a bypass contractor or an intermediate unit, and (b) districts with enrollments under 600. See Section I for explanation.

I INTRODUCTION

This report focuses on services to private school students under Chapter 2 of the Education Consolidation and Improvement Act (ECIA) of 1981, the education block grant. We introduce the report by reviewing the history of the involvement of private school students in federal programs, as well as the changes brought about by the block grant; in addition, we briefly describe SRI's approach to studying the participation of private school students in services supported by Chapter 2, by describing the research questions addressed in this study, as well as SRI's methods and data sources. In the body of the report, we first present a descriptive profile of local practices under Chapter 2, focusing on participation information, funds allocation, services, and administration. We then address issues that have arisen concerning the participation of private school students in Chapter 2, paying particular attention to issues of access, equal per pupil expenditures, equitable services, and administration. Finally, we assess the costs and benefits (from both the public and private school perspectives) of the participation of private school students in Chapter 2.

History of Involvement of Private School Students in Federal Programs

The provision of educational services to private school students with federal money is not a new issue under Chapter 2. Historically, the participation of private school students in federal programs began under the Elementary and Secondary Education Act (ESEA) of 1965; most of the programs under this act had provisions mandating or permitting the participation of private school students (Manno, 1980). This participation was made possible by an agreement concerning the "child-benefit approach to Federal aid" (School Finance Project, 1983). That is, Congress approved ESEA after various interest groups agreed that federal aid should focus on the private school student rather than the school; "it was not to be considered aid to the school itself" (School Finance Project, 1983). Throughout the 1960s and 1970s, the requirements for involving private school students in federal programs were clarified, broadened, and strengthened, for example, under the Education Amendments of 1974 and 1978 (see School Finance Project, 1983, for a review of participation requirements under various programs).

In many of these programs, various constraints were built into the requirements for the participation of private school students. First, services could be provided only to private school students attending nonprofit private schools that met various criteria (e.g., nondiscriminatory schools). Private school students typically had to receive services on an equitable basis with public school students. Services often had to be provided after consultation with private school officials, and the services received had to be "secular, neutral, and nonideological." In addition, the local school district had to retain control over funds and property. A procedure called a bypass was developed whereby the federal government, through a contractor, would provide the services directly to the private school students if the state or local education agency (LEA) was either prohibited by law from providing the services or had substantially failed to do so.

Relatively little information is available about the services received by private school students prior to the block grant under the federal programs consolidated into Chapter 2.* According to some researchers (School Finance Project, 1983), "this is due largely to methodological problems related to defining the universe of private schools, obtaining a representative sample, and securing access to all types of private schools" (p. 31).

In looking across the programs consolidated into Chapter 2, participation of private school students showed much variation by the type of program. Although private school students were eligible to participate in most of these programs, they participated to the greatest extent in ESEA, Title IV-B (School Library Resources). For example, in Spring 1980, 99% of Catholic schools and 43% of other private schools reported that their students participated in this program (Coleman, 1981); NCES (Nehrt, 1981) reports similar Title IV-B participation figures for 1978. Many fewer private schools had students who participated in ESEA, Title IV-C, which provided funds for innovative practices in schools: 13% of the Catholic schools, 4% of the other denominational schools, and 7% of the unaffiliated schools (Nehrt, 1981). Participation in other federal programs consolidated into Chapter 2 was quite negligible; in particular, few private school students participated in ESAA (Emergency School Aid Act), the second largest program to be incorporated into Chapter 2 (Fries, 1983).

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*See Appendix B for a list of the programs consolidated into Chapter 2.

On the whole, the participation data show that the major types of private schools with students participating in the programs incorporated into Chapter 2 were the Catholic schools. The focus of private school student participation was library books, other instructional materials, and equipment.

Few studies have addressed issues other than participation. Although 32 programs were consolidated into the education block grant, in-depth information about these programs is available only for ESEA, Title IV-B (School Library Resources) and Title IV-C (Support and Innovation). Some information (McDonnell and McLaughlin, 1980) has been gathered about the extent and quality of services received by private school students under these two programs, in order to see whether their mandates for equitable participation were being carried out. The findings were quite different for the two programs, as follows.

In Title IV-B, most eligible private school students received some type of services; in the cases where private school students did not participate, the reasons generally had to do with the private school officials--i.e., either they were philosophically opposed to such services or they felt that the small amount of money available for the services was not worth the effort involved. However, although the extent of participation may have been equitable, the private school officials often were not very involved in decisionmaking regarding the services to be received under Title IV-B. The participation of private school students in IV-B was sometimes viewed by district administrators as a burden, especially in large districts with many private schools, because of the lack of sufficient funds for administering these services.

On the other hand, in Title IV-C, the extent of participation by private school students was much lower than in Title IV-B. This lack of participation seemed to be due partially to the failure of state education agencies (SEAs) to verify the participation of private school students or to encourage this participation. In addition, because IV-C grants were competitive, LEAs faced time pressures that may have discouraged their seeking this participation; some LEAs also may have felt that responsiveness to the needs of private school students weakened their proposals' focus and quality. Some nonparticipation may have been due to characteristics of the private school officials--e.g., being uninformed about the IV-C program, lacking administrative time to become involved in such projects, or deciding not to push involvement so as not to jeopardize an existing good relationship with the district. In addition, in places where the state established substantive priorities for IV-C projects, the private school officials often found these priorities inappropriate to the needs of their students. Private schools that belonged to organizations were more likely to have students participate in Title IV-C than those not belonging to organizations. Organizations, such as the Catholic dioceses, help make information about federal aid available to private school officials and serve as vehicles to monitor the participation of private school students.

In addition to low participation of private school students in Title IV-C, there was little consideration of the needs of these students in planning IV-C projects, and the quality of services received by private school students seemed to be lower than those received by public school students. In fact, it was reported that a common scenario was for the LEA to develop a IV-C project without consulting any private school officials;

just before the application was due, the LEA contacted a cooperative private school principal who signed an assurance that he or she was informed. Thus, consultation was often after-the-fact and pro forma, and there were no guarantees that the needs of the private school students were met.*

Changes Since the Block Grant

Chapter 2 contains many provisions for the involvement of private school students. For example, in Chapter 2, LEAs must ensure the equitable participation of private school students as compared with students enrolled in public schools; private school officials must be consulted; services (that are secular, neutral, and nonideological) meeting the needs of the private school students must be provided; and per pupil expenditures for public and private school students must be equal, taking into account the needs of the individual students. Although these and other private school student participation requirements are "nearly verbatim copies" of requirements under ESEA, Title IV (Anderson-Ng and Chelemer, 1984), they have received much more attention under Chapter 2 than under the programs that existed before the block grant. For example, 27 of the 156 questions in Chapter 2's Nonregulatory Guidance issued by the U.S. Department of Education (ED) deal with the participation of private school students, even though 23 other areas are also covered (Anderson-Ng and Chelemer, 1984). In addition, the participation of private school students in Chapter 2 has received considerable attention from state and local public school administrators, private school officials, and Department of Education officials.

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* The issues raised in this study of Title IV-B and IV-C are not unique to the programs consolidated into the block grant. For example, studies of ESEA Title I (Jung, 1982), continued as Chapter 1 under ECIA, also have raised issues of access, equitable services, and equal expenditures.

This new emphasis on the participation of private school students under Chapter 2 seems to be due to several factors. First, in the current political climate, debates on private school student issues (e.g., concerning vouchers, tuition tax credits) have received a great deal of attention. Second, although federal funding for categorical programs has generally been reduced, the block grant encourages students from private schools to receive services purchased with funds formerly used in programs (such as ESAA) that did not serve them. These changes in the participation of private school students with the block grant will be discussed in detail in Sections III and IV.

Over the last several years, many investigators have looked at the participation of private school students in Chapter 2 (e.g., American Association of School Administrators, 1984; Fries, 1983; General Accounting Office, 1984; Hastings and Bartell, 1983; Henderson, 1983, 1984; Kyle, 1983, 1985). However, these studies have not produced nationally representative data on the local-level issues surrounding the participation of these students. SRI's study tries to fill this gap by combining a national survey of LEAs with intensive data collection from a case study sample of LEAs, SEAs, and private schools.

Research Questions

The questions addressed in this study are as follows.

Description of Local Practices

(1) To what extent do private school students participate in Chapter 2?

(2) What amount and proportion of their Chapter 2 funding do districts use to provide services for private school students?

(3) What services do private school students receive under Chapter 2?

(4) How do districts administer the private school student component of Chapter 2?

Issues of Equitable Participation

(5) Do private school students have equitable access to Chapter 2 services?

(6) Is the per pupil amount spent on Chapter 2 services for private and public school students equal? What explains any inequalities in spending?

(7) Do private and public school students receive Chapter 2 services that are comparable and appropriate to their needs?

Administrative Issues

(8) How extensively do public school officials consult with private school officials regarding Chapter 2 services?

(9) How complex and burdensome is the administration of Chapter 2 services for private school students?

(10) How has the block grant affected the quality of relations between public school districts and private schools?

Costs and Benefits

(11) What have been the costs and benefits to public school districts of the involvement of private school students in Chapter 2?

(12) From the perspective of private school officials, what have been the costs and benefits of private school student involvement in Chapter 2?

Methods and Data Sources

Below, we briefly describe SRI's study methods and data sources. Further details about SRI's approach can be found in the appendix of the main descriptive report of the National Study (Knapp and Blakely, 1986).

SRI collected both quantitative and qualitative data concerning the participation of private school students in Chapter 2.* These data came from four sources. The first source was a mail survey of local Chapter 2 coordinators, conducted during the middle of the 1984-1985 school year. A mail questionnaire was sent to Chapter 2 coordinators in 1,600 local school districts (of the approximately 15,500 districts in the United States) selected in a nationally representative manner and stratified by geographic region of the country, district size (enrollment), and the amount of funding received (per pupil) under the antecedent programs consolidated into Chapter 2. Completed questionnaires were received from 1,252 districts, a 78% response rate. This mail questionnaire addressed many topics concerning local operations of Chapter 2 and contained approximately 15 items concerning the participation of private school students.

In this report, data reported from the mail survey generally will focus only on those districts with private schools that are eligible to have their students participate in Chapter 2 and in which the private school student component is administered by the district, rather than by the state (as in the bypass states of Missouri and Nebraska) or intermediate units (as in states such as Pennsylvania). All data reported from the mail survey have been weighted, so that the figures represent national estimates.

The second data source for this report was interviews conducted in the fall of the 1984-1985 school year with various respondents in a small, representative, general-purpose sample of 24 LEAs. These school districts (in 13 states) were a subset of the districts in the mail survey, and were chosen to reflect the principal variations in regional location, district size, and antecedent funding levels represented in the mail survey stratification grid. The choice of sites also balanced a number of other selection criteria, such as metropolitan status, presence of a desegregation plan, fiscal condition, and types of activities supported by block grantfunds for public school students.* In those districts that had private schools located within their boundaries (19 of the 24 districts), private school student issues were addressed at a general level in interviews with local Chapter 2 coordinators.

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* At the time of data collection for this study, a major court case concerning the provision of Chapter 2 services for private school students (Taft et al. v. Arthur R. Pontarelli and Terrel Bell, U.S. District Court, District of Rhode Island) was still pending. In addition, a case concerning the provision of Title I services on the premises of religious schools (Aguilar et al. v. Felton et al., U.S. Supreme Court, decided July 1, 1985) had not yet been decided; this case also has potential ramifications for Chapter 2 programs for private school students.

The third data source was interviews conducted in the spring of the 1984-1985 school year in a special-purpose site visit sample of 24 LEAs and, within them, 68 private schools. These districts (in 8 states) were selected purposively to allow us to pursue various special issues, including issues surrounding the participation of private school students in services supported by Chapter 2. Districts in bypass states and in states administering this participation at an intermediate-unit level were not included, because a study of those districts was beyond the scope of SRI's effort.

To select these 24 districts, we first selected states that varied on such dimensions as the size of the private school population (as well as dimensions related to the other special topics to be investigated). Districts then were selected to vary on such dimensions as the nature and number of private schools in the district, as well as other factors concerning the involvement of private school students in Chapter 2.

Within these districts, semistructured interviews were used to explore private school student issues with the following respondents (and others, as relevant):

- Chapter 2 coordinators.

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*Information about activities supported by Chapter 2 was obtained in telephone calls to districts during the sampling process.

- Other district administrators who deal with the participation of private school students in Chapter 2.
- School board members.
- Representatives of local private school organizations, such as diocesan government program liaisons.
- Principals of local private schools with students participating in Chapter 2, as well as other relevant private school personnel.

The sample of private schools was selected to vary on the following four major dimensions, whenever possible:

- Type of religious affiliation: Catholic schools, other denominational schools, and nondenominational schools.
- Types of educational activities supported by Chapter 2 funds over the 3 years of Chapter 2.
- Grade level.
- Students participating in antecedent programs and students not participating in antecedent programs.

In addition, we tried to vary schools in terms of the nature of their student population (e.g., number of students with special needs) and the nature of their relationship with the school district (e.g., smooth or contentious). Finally, in some sites, we telephoned the principals of a sample of private schools whose students were not participating in Chapter 2.

The districts in this sample included from one to several hundred private schools within their boundaries. The number of private schools visited in each district depended on the size of the district, ranging from 1 in the smaller districts to 7 in the larger districts. Overall, we interviewed personnel in 68 private schools:* 45 Catholic schools, 16 other denominational schools (e.g., Episcopal, Lutheran, Jewish, Christian, Seventh Day Adventist), and seven nondenominational schools. In addition, principals of 7 private schools (both denominational and nondenominational) were contacted by telephone.

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* Although this sample was not chosen in a statistically representative manner, nor is it large enough to permit national estimates, it is large and varied enough to be useful for drawing conclusions about the range and types of effects of block grant funding on this population.

The fourth source of data was interviews in the spring of the 1984-1985 school year with state-level respondents in the eight states in the special-purpose site visit sample. These respondents included individuals at the SEA responsible for the private school student component of Chapter 2 (e.g., Chapter 2 coordinator, SEA nonpublic liaison), as well as representatives of state-level private school organizations, such as state Catholic Conferences and organizations of independent schools.

Organization of the Report

In Section II, we present our findings concerning the first four research questions in the form of a descriptive profile of local practices under Chapter 2. The next three sections discuss issues of equitable participation: Section III discusses access; Section IV focuses on per pupil expenditures, and Section V covers services. Administrative issues are discussed in Section VI. Finally, Section VII summarizes the issues and concludes with a consideration of the costs and benefits (from both the public and private school perspectives) of the private school student component of Chapter 2.

II DESCRIPTIVE PROFILE OF LOCAL PRACTICES UNDER CHAPTER 2

In this section, we present an overview of our findings concerning local practices under Chapter 2. These findings describe:

- Participation of private school students.
- Local allocation of funds for services to private school students.
- Services to private school students.
- Administrative practices.

Participation of Private School Students

As can be seen in Table II-1, approximately two-fifths (42%) of all districts have private schools within their boundaries eligible to have their students participate in Chapter 2.* This percentage varies greatly by district size; all the districts enrolling 25,000 or more students have eligible private schools, but the percentage decreases greatly in the smaller districts, to a low of 16% in districts enrolling fewer than 600 students.

The small percentage of very small districts (enrollment under 600) with eligible private schools has implications for reporting results from the private school student section of the mail survey. Given our sample

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* Private schools must be nonprofit and comply with Title VI of the 1964 Civil Rights Act (nondiscrimination on the basis of race or national origin) in order to be eligible for their students to receive services under Chapter 2.

Table II-1

DISTRICTS WITH PRIVATE SCHOOLS THAT HAVE STUDENTS ELIGIBLE TO PARTICIPATE IN ACTIVITIES SUPPORTED BY CHAPTER 2, BY SIZE OF DISTRICT

District Size (Enrollment Range)	Percentage of districts in the 1984-85 school year that ...	
	Have eligible private schools	Administer the private school student services*
Very large (25,000 or more)	100	96
Urban	100	94
Suburban	100	100
Large (10,000 to 24,999)	96	87
Medium (2,500 to 9,999)	74	61
Small (600 to 2,499)	46	39
Very small (under 600)	16	--**
All districts	42	51+

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*Excluding districts where the private school student component is handled by a bypass contractor or an intermediate unit. This is the case in 12% of the districts nationwide that have eligible private schools.

**Too small a sample size for national estimates (see text).

+Excluding very small districts.

size, any national estimates derived from these data on the very small districts are based on approximately 10 school districts, less than 1% of the population of very small districts nationwide; the weighted national estimates using these data are extremely unreliable. Therefore, throughout the rest of this report, data will not be reported for the very small districts; in addition, any estimates of prevalence among all districts will refer only to those districts with enrollment of at least 600.*

In the majority of those districts with eligible private schools, the private school student component of Chapter 2 is administered at the local level, rather than (in a small number of states) at the level of intermediate units or through a bypass contract with the U. S. Department of Education. This report will focus on only those districts administering the private school student component of Chapter 2 at the local level (see Table II-1); a discussion of the other districts is beyond the scope of this study.

Not all eligible private schools elect to have their students participate in Chapter 2. As can be seen in the first column of Table II-2, about three quarters of districts with eligible private schools have at least some schools with students participating. When all districts in the nation are considered, this figure drops to a little over a third, as the second column in the table indicates. Again, the extent of participation varies by district size, with the majority of larger districts, but only a minority of smaller districts, serving private school students.

Districts vary widely in the number of private schools with students participating in Chapter 2. Overall, in the average district, approximately two-thirds of the eligible schools have students participate in Chapter 2. As Table II-3 shows, the number of these schools varies greatly by district size. These numbers still mask a large variation among individual districts.

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*6,508 districts of a total of 15,533 (41.9%) are thus excluded from analysis; these comprise 3.8% of the nation's students.

Table II-2

DISTRICTS SERVING PRIVATE SCHOOL STUDENTS IN ACTIVITIES SUPPORTED BY CHAPTER 2, BY SIZE OF DISTRICT

District Size (Enrollment Range)	Percentage of districts serving private school students in the 1984-85 school year among... Districts with eligible private schools*	All districts nationwide
Very large (25,000 or more)	95	87
Urban	98	90
Suburban	92	89
Large (10,000 to 24,000)	86	75
Medium (2,500 to 9,999)	79	47
Small (600 to 2,499)	67	26
All districts (600 or more)	75	37

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*In which private school student component is administered at the district level.

Table II-3

AVERAGE NUMBER OF PRIVATE SCHOOLS AND PRIVATE SCHOOL STUDENTS ELIGIBLE FOR, AND PARTICIPATING IN, CHAPTER 2, BY SIZE OF DISTRICT

	Median number of private schools per district ...		
District Size (Enrollment Range)	Eligible for Chapter 2-supported activities in 1984-85*	With students participating in Chapter 2-supported activities in 1984-85**	Median number of private school students per district participating in Chapter 2 in 1983-84**,+
Very large (25,000 or more)	19	12	3,143
Urban	29	17	4,164
Suburban	15	7	2,596
Large (10,000 to 24,999)	5	4	1,097
Medium (2,500 to 9,999)	2	2	338
Small (600 to 2,499)	1	1	199
All districts (600 or more)	2	2	350

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[*] Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

[**] Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

[+] Because of the constraints of the data gathered, this number could be estimated only for those districts (94%) reporting that they spent an equal amount for services to public and private school students under Chapter 2 (see Appendix A for details).

Across all size categories, the number of eligible private schools ranges from 1 to 435, the number of schools with participating students ranges from 1 to 328, and the number of participating private school students ranges from 6 to 96,238.*

The types of private schools with students participating in Chapter 2 include both religious and nondenominational schools. In nearly all districts of enrollment greater than 600 (94%) serving private school students under Chapter 2, the students attend at least one school affiliated with a religious denomination. In our site visits, the most common private schools with students participating in Chapter 2 were Catholic, which was to be expected since Catholic schools make up about 50% of the nation's private schools (Nehrt, 1981), and since many studies (e.g., Coleman, 1981) have pointed to virtually 100% participation of these schools in Title IV-B, the main antecedent program in which students in private schools participated. We also saw other examples of both denominational (including Jewish, Christian, Lutheran, and Seventh Day Adventist) and nondenominational schools with students participating in Chapter 2.

Local Allocation of Chapter 2 Funds for Services to Private School Students

In districts that provide services to private school students, a proportion of the district's Chapter 2 allocation is available for these services. As one might expect, the average (median) amount of Chapter 2 funds for services to private school students, displayed in Table II-4, is greater in larger districts, reflecting (at least in part) the greater number of private school students in larger districts. There is a great deal of variation underlying these figures, however; among the districts in our data set, the amount of funds available for services to private school

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*Because of nonresponse, our data do not include the largest local education agency in the nation.

Table II-4

AVERAGE AMOUNT OF CHAPTER 2 FUNDS (AND PROPORTION OF DISTRICT'S CHAPTER 2 ALLOCATION) AVAILABLE FOR SERVICES TO PRIVATE SCHOOL STUDENTS IN THE 1984-85 SCHOOL YEAR, BY SIZE OF DISTRICT

District Size (Enrollment Range)	Median amount available from district's allocation*	Mean percentage of district's Chapter 2 allocation*	Median amount of Chapter 2 funds available per private school*
Very large (25,000 or more)	$28,908	9	$2,224
Urban	42,851	11	2,289
Suburban	18,312	7	2,041
Large (10,000 to 24,999)	7,500	8	1,948
Medium (2,500 to 9,999)	2,801	11	1,442
Small (600 to 2,499)	1,423	19	879
All districts (600 or more)	2,576	14	1,272

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* Among districts having one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

students ranges from $75 to $905,685. The amount available for services to private school students represents an average of 14% of a district's Chapter 2 allocation, with a range from nearly zero to 56%.*

Table II-4 also presents the average amount of Chapter 2 funds per school for services to private school students; these figures are tabulated with the school as the unit of analysis because, administratively, services to private school students are organized in this way.** Nationally (for districts with enrollments of at least 600), the median amount is $1,272; this amount is higher in larger districts, which receive more "high-cost" money under Chapter 2 and perhaps have larger private schools.+

Services for Private School Students

To study the services provided to private school students, we have divided the educational activities supported by the block grant into six main categories:

- Computer applications: Computer hardware and/or software.
- Other instructional materials and equipment: Materials and equipment, other than computers, for libraries, media centers, or other school departments.

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*Including formula and discretionary money. Under Chapter 2, SEAs are required to pass at least 80% of the state grant through to local districts, which is distributed by a state formula; the remaining state set-aside money (discretionary funds) can be used for many purposes, including grants (competitive or not) to districts.

**We do not have accurate data on per pupil expenditures for services to private school students.

+Most state formulas provide extra compensation for high cost students, who tend to be concentrated in larger districts. (Smaller districts also receive higher per pupil allocations because of adjustments for sparse population; however, as explained in Section I, the smallest districts are not included in the analyses of this report.) This results in larger allocations in larger districts, which will then be used for services for both public and private school students. See Apling and Padilla (1986).

- Curriculum or new-program development: Creation or elaboration of curricula or new programs.

- Student support services: Any noninstructional direct student service, such as counseling, assessment, or dropout prevention.

- Instructional services: Instructional programs, such as compensatory, bilingual, English as a second language, or gifted and talented programs.

- Staff development: Inservice training or other training activities for teachers or other staff.

Under Chapter 2, as under Title IV-B, private school students are being served mainly with materials and equipment.* In fact, we often heard from private school principals that the change to Chapter 2 was just a "name change" from Title IV-B.

Nationally, private school students in a large majority of districts have access to instructional materials and equipment other than computers (92%), as well as computer hardware and software (68%), through Chapter 2 (see Table II-5**). In fact, in 96% of districts, students have access to at least one of these services. We saw many examples of these types of services in our site visits, such as computer hardware and software for use in computer labs or classrooms, audiovisual equipment, filmstrips, reference materials (e.g., books, encyclopedias) for libraries or classrooms, maps, globes, etc.

Other types of services to private school students occur much less frequently under the block grant. Private school students in approximately one-quarter of the districts that serve these students benefit from

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* This study did not collect national data on the percentage of Chapter 2 funds used to provide various services to private school students.

** The figures in Table II-5 represent services aggregated at the district level; however, from our site visits we learned that, typically, students in a given private school have access to only one or two services under Chapter 2.

Table II-5

CHAPTER 2 SERVICES TO PRIVATE SCHOOL STUDENTS BY SIZE OF DISTRICT

District Size (Enrollment Range)	Percentage of districts* in which each activity has been supported by Chapter 2 funds in the last 3 years for private school students:					
	Computer applications	Other instructional materials and equipment	Curriculum or new program development	Student support services	Instructional programs	Staff development
Very large (25,000 or more)	84	100	22	16	6	30
Urban	85	100	23	15	5	39
Suburban	80	100	17	20	9	11
Large (10,000 to 24,999)	83	95	21	12	10	16
Medium (2,500 to 9,999)	64	91	20	9	7	14
Small (600 to 2,499)	66	91	24	6	4	6
All districts (600 or more)	68	92	22	9	6	11

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*Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

curriculum or new-program development supported at least in part by Chapter 2. Students in even fewer districts receive direct services aimed at student support (e.g., counseling, testing) or instruction (e.g., compensatory, bilingual). In our site visits, we encountered a few examples of these direct services, such as an aide provided in one district to serve private school Chapter 1 and gifted students, and another district in which a music teacher was provided.

Finally, in only a small percentage (11%) of districts are private school personnel participating in staff development funded by Chapter 2.* The staff development can take several forms. First, some private school officials request that the district hire a consultant to provide a workshop or other training for the private school personnel. Second, staff members at private schools are often invited to staff development activities sponsored by the district (or the state) and funded by Chapter 2. Finally, staff development activities can be provided for staff in several private schools (either in the same district or in many districts). For example, the government programs liaison at one diocesan office we visited convinced the Catholic school principals in the 19 LEAs within the diocese whose students generated "high-cost" money under Chapter 2 to let this money be used to provide consolidated services to all the private school personnel in the diocese (which covers 57 districts).** Thus, Chapter 2 money is currently used to provide staff development for personnel in all the schools in the diocese. Topics have included multicultural education, computer education, Madeline Hunter's approach to teaching, and drug and alcohol abuse; the specific activities can serve personnel in the whole diocese, part of the diocese, or particular Catholic schools.

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*This percentage may be underestimated in our data, as respondents may not have included staff development funded by the portion of the LEA's Chapter 2 funds available to provide services to public school students (to which private school personnel are often invited), as well as staff development funded by the SEA's share of Chapter 2.

**In this state, the SEA informs each district of the amount of the Chapter 2 allocation generated by high-cost factors in the state Chapter 2 formula. See third footnote on page 20.

There seems to have been very little change in the services provided under Chapter 2 to private school students over the 3 years of the block grant. In the sites we visited, the most common change was a new kind of material or different piece of equipment provided. The changes often reflected the pattern that private schools were provided services in one area until needs in other areas became more prominent. For example, in one large suburban district, computers were purchased with block grant funds for private school students to use in the early years of Chapter 2; by the third year of the block grant, private school officials told the district to redirect some of the Chapter 2 support toward the library because it had been ignored with the push to computers. Several private schools in other districts requested that the Chapter 2 money be used to provide computers in the latter years of Chapter 2, perhaps as computers became more popular and inexpensive; one private school principal stated, "That [computers] was all you heard about." On the other hand, in a very large urban district, the Chapter 2 coordinator stated that, over time, the needs of private school students had shifted away from equipment (e.g., computers, audiovisual equipment) to library books and magazines, because "equipment lasts longer than it used to, and there's a point where you have enough equipment."

Typically, most of the services for private school students or staff under Chapter 2 were provided on the site of the private school.* We saw many examples where materials and equipment were marked by the district and then delivered to the private school to be used there. In the sites we visited, we also saw that the public school staff supported by Chapter 2 served private school students in the private schools.* However, private schools had to make accommodations, if necessary, such as removing religious symbols from rooms in which these individuals worked.

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* The one main exception to the provision of services on-site is staff development; the location of the staff development varies, and can be on-site, at the office of private school organizations (such as the diocese), at the public school district, or at other locations.

The services provided to private school students under Chapter 2 tend to be used to benefit most (if not all) of the students in the school, or else all the students in specific grades, rather than being targeted to the special needs of a few. In part, the lack of targeting is due to the nature of the services under Chapter 2 (mainly materials and equipment). In addition, many private schools tend to be small and have few students with special needs, unless they serve only special populations, such as schools for the handicapped. Private school personnel are not likely to request that Chapter 2 funds (particularly if it is a small amount) be used to serve a small fraction of their student body, especially if the school is poor and has limited sources of money. Finally, we heard some private school principals state that it is their philosophy to spread Chapter 2 services to all students.

Administrative Practices

In most of the districts we visited, the activities involved in administering the private school student component of Chapter 2, including notification of private schools, consultation with private school officials, record keeping, and monitoring, are fairly routinized procedures. In general, they differ very little (if at all) from procedures established under the antecedent programs, particularly Title IV-B. This is true mainly because private school officials are continuing to view Chapter 2 as a way to augment the materials and equipment used by their students, and districts are following the administrative procedures established under Title IV-B.

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* At the time of data collection for this study, a court case concerning the provision of Title I instructional services on the premises of religious schools (Aguilar et al. v. Felton et al., U.S. Supreme Court, decided July 1, 1985) was still in process. In its decision, the court found it to be excessive entanglement of church and state when these services were provided on the premises of private schools. This case has potential ramifications for Chapter 2 services for private school students.

Below, we first address notification and consultation practices, followed by a discussion of local monitoring and evaluation. Finally, we consider the role of the SEA, as well as private school organizations, in the local Chapter 2 programs.

Notification and Consultation

Although local district practices vary regarding notification and consultation, it is possible to construct a composite scenario. Local school districts learn which private schools to notify in a variety of ways. In some states, the SEA sends each district a list of all private schools within the district's boundaries, whether or not they are eligible to have students participate in Chapter 2. In other states, the SEA's list includes eligible private schools only. States compile these lists of eligible schools in various ways, such as including all accredited schools, only nonprofit schools, or all those in compliance with Title VI of the Civil Rights Act. Finally, in other states, districts must identify for themselves the private schools within their boundaries, and determine which are eligible for Chapter 2. In these cases, district personnel have several sources for identifying schools: existing lists, schools that have students participating in other state or federal programs, and (particularly in smaller districts) knowledge of the community.

Typically, each year the Chapter 2 coordinator notifies each private school on the district's list about the availability of services from Chapter 2. Districts use a variety of practices, including regular mail, certified or registered mail, telephone calls, and personal visits. In some sites, district personnel also notify schools not on the state-approved list, just to be on the safe side. If the private schools are not already determined to be eligible by the state, the district may sometimes ask for proof of nonprofit status or nondiscrimination. Overall, approximately one-quarter of districts require private schools to sign assurances of nondiscrimination (24% of districts with enrollment of at least 600); 15% check the nonprofit status of private schools. If eligible schools indicate that they do not wish their students to participate in Chapter 2, some states require a waiver letter to be signed; others do not.

The district Chapter 2 coordinator then often holds a meeting of the private school principals to discuss application procedures, the amount of funds available to provide services to private school students, Chapter 2 guidelines (86% of districts with enrollment of at least 600 report that they provide some type of guidance), etc. Private school organizations sometimes are involved at this point; in particular, diocesan representatives may be in attendance at these meetings, particularly in districts near a diocesan office. However, some districts handle these matters by letter. In either case, each private school principal then fills out an application form or otherwise communicates to the LEA his or her requests for services to be provided, often after discussing the program with his or her school staff. Most forms we saw were similar to the ones used by the district for the public school activities supported by Chapter 2. The district then synthesizes the requests of the private school principals, e.g., by collecting and reviewing the private school applications (getting revisions as necessary), attaching them to the district's application, and sending the entire package to the SEA.

For the great majority of districts that provide services to private school students in the form of materials and equipment, once the application is approved by the SEA, the private school officials request specific materials and equipment (often by completing an LEA purchase order); the district then orders the materials or equipment for them. We saw many cases where the items are delivered to the district, then marked with the program name or as property of the district, and then delivered to the private schools.

Overall, the process of notification and consultation often consists of various paper transactions, particularly in larger cities where the procedure is, by necessity, more bureaucratic because of the large number of private schools. In smaller districts, more personal contact seems to be involved. In some districts, there is frequent communication between the Chapter 2 coordinator and private school principals concerning allowable services, purchase orders, etc.; in others, there is less contact.

Monitoring Practices

All but a few districts claim that they monitor services for private school students in some fashion (see Table II-6); only 5% of districts with enrollment of at least 600 indicate that they do not monitor Chapter 2-supported purchases or activities for students in private schools.*

In general, the larger districts report more monitoring than the smaller districts; this may be true for at least several reasons:

- Large districts often have a federal programs office, whose personnel are very experienced in running federal programs; monitoring is just part of the standard operating procedure in such a department.
- The Chapter 2 coordinators in larger districts tend to have fewer other responsibilities than Chapter 2 coordinators in smaller districts.
- The fact that larger districts tend to be monitored more often by the state concerning Chapter 2 may make the districts more likely to monitor their own Chapter 2 activities, including the private school student component.

In our site visits, we saw that districts used a variety of methods to monitor the private school student component of Chapter 2. Districts generally checked private school applications (or equivalent requests from private school officials), before the applications were sent to the state,

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*In this study, we have adopted a very broad definition of monitoring; see Table II-6 for specific activities considered. If the definition of monitoring is narrowed to include only those activities in the third, fourth, and fifth columns of Table II-6, 39% of districts of enrollment of at least 600 report no monitoring activities.

Table II-6

DISTRICT MONITORING OF CHAPTER 2-SUPPORTED SERVICES FOR STUDENTS IN PRIVATE SCHOOLS, BY SIZE OF DISTRICT

	Percentage of districts* that...						
District Size (Enrollment)	Require private schools to sign assurances of non-discrimination	Check nonprofit status of private schools	Check Chapter 2 services for secular nature/use**	Check that Chapter 2 services benefit students, not schools	Check that Chapter 2 services are supplementing, not supplanting	Check that services conform to Chapter 2 guidelines	Do not monitor Chapter 2-supported services for students in private schools
Very large (25,000 or more)	62	48	61	59	56	89	2
Urban	55	46	72	73	60	95	0
Suburban	75	53	53	42	50	86	3
Large (10,000 to 24,999)	31	21	58	55	38	85	2
Medium (2,500 to 9,999)	26	15	36	39	42	82	5
Small (600 to 2,499)	14	8	42	40	33	74	7
All districts (600 or more)	24	15	42	42	39	79	5

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[*] Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

[**] Only in districts that have one or more religious schools with students participating in Chapter 2.

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for conformity to a variety of guidelines (to be discussed below); during this process, some districts also consulted with the SEA. For example, one Chapter 2 coordinator often sent his questions up to the state level because he did not want to spend his time interpreting the SEA's guidelines; he felt that "it's his [the SEA Chapter 2 coordinator's] job...that's what he's paid for." In addition, purchase orders often were checked, by either the Chapter 2 coordinator or another individual, such as a secretary or bookkeeper. Materials then were sometimes checked (and marked) when they arrived at the district. The Chapter 2 coordinator in one very large city district also felt that "doing our own warehousing has kept our noses clean."

We rarely learned of formal on-site monitoring of Chapter 2 services in private schools by district personnel. For example, Chapter 2 coordinators in very large districts with hundreds of private schools find it impossible to monitor on-site. In addition, Chapter 2 coordinators sometimes feel that their monitoring obligations are met without going on-site, and they trust the private school officials. The on-site visits we heard about were generally informal. For example, one private school principal said that the Chapter 2 coordinator "comes over a few times a year and walks through." Another private school principal stated that the Chapter 2 coordinator "informally visits...not checks...just observes." These visits sometimes are also done in conjunction with other responsibilities. For example, several Chapter 2 coordinators we interviewed had visited the private schools and informally checked on Chapter 2 while they were checking on other programs, such as Chapter 1.

Because of the methods used for monitoring, district personnel usually check about the nature of private school student services (e.g., whether they are secular, of benefit to students and not schools, and supplemental) but rarely check to see how specific items are used. District personnel feel that it is very difficult to monitor use; some feel that their obligations do not include this activity. For example, one Chapter 2 coordinator felt that such monitoring was "none of my business." Another Chapter 2 coordinator does not monitor use, feeling that the private school officials know the restrictions; he added, "If an infraction came to my attention, I would follow up on it...but I'm not going to be a police dog."

From our site visits, we saw practices such as checking whether purchase orders matched the applications, and (in the instances where district personnel visit private schools) whether the materials and equipment were properly marked. In terms of specific monitoring, as can be seen in Table II-6, the most common practice is to do some form of monitoring to check whether Chapter 2 services conform to guidelines. Below, we discuss three guidelines of Chapter 2 that are sometimes monitored: secular nature or uses of Chapter 2 services, benefit to students not schools, and supplement-not-supplant provisions.

As can be seen in Table II-6, 42% of districts with participating religious schools check that Chapter 2 services for students in these schools are of a secular nature or used for nonreligious purposes. In our site visits, we found that typically this monitoring was done by reviewing the private schools' applications (or other forms of request) and the LEA's purchase orders for services for private school students, rather than by on-site monitoring to check actual use. Most private schools have students participating in other federal or state programs, and private school officials seem to be well aware of this common restriction; even school officials new to federal programs are familiar with this guideline. We were told that, in the process of checking applications and orders, few cases arose where private schools asked the LEA to use Chapter 2 funds for religious items. The few problems that arose involved private schools proposing that the district provide items that might be used for religious purposes (even though the private schools did not say they intended to do so). For example, in one district, the Chapter 2 coordinator called a private school principal to ask whether the supply paper provided by Chapter 2 for the students in her school would be used for religious studies.

It seems to be more unusual for districts to check that items are used only for secular purposes. District personnel in both large and small districts often trusted private school officials on this matter; this sentiment was expressed by a Chapter 2 coordinator in a small rural district: "I trust their integrity not to use these items for religious purposes." Typically, private school principals are well aware of this restriction, although sometimes their staff members are less aware.

Although we did see one or two examples in which this restriction was violated, such as audiovisual equipment and computers being used in religion classes, they seemed to be exceptions.

Forty-two percent of districts check that Chapter 2 services benefit students, not the private schools. Again, this type of monitoring typically occurs through application and purchase order review; during this process, Chapter 2 coordinators often check whether the proposed activity is instructional or not. In one very large city we visited, a private school official proposed that the district use Chapter 2 to provide inservice for private school administrators. The Chapter 2 coordinator was unsure whether this was allowed, checked with the SEA, and found that it was not allowed. In this same district, the Chapter 2 coordinator sometimes asked for assurances about usage from the private schools; when one private school requested that the district provide typewriters, for his own protection the coordinator asked the school to assure him that they would be used only for instruction. This same individual also does sometimes informally visit schools; he said that, although he does not monitor use, "I would notice if the computer was used in the office."

Approximately the same percentage of districts check that Chapter 2 services are supplementing, rather than supplanting, private school activities. This type of monitoring also often occurs through application and purchase order review. Although we saw some examples where Chapter 2 funds were used to purchase textbooks for use by private school students,* other Chapter 2 coordinators did not allow this use of Chapter 2 funds because of the supplement-not-supplant provision.** For example, one Chapter 2 coordinator told us that he allows a private school official to request only up to 15 copies of a book; "I don't want [Chapter 2 to provide] basal books because that is not supplementary."

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*In fact, we visited a state in which the application form to be used by private schools contains "Textbooks" as a category for expenditures.

**The provision of textbooks to be used to serve private school students is not necessarily supplanting. Supplanting occurs only if Chapter 2 funds are used to provide services that replace what the private school would have to provide to give a basic education to its students.

In sum, districts vary in what they monitor; most often, the nature of services is checked, but not usage. However, personnel in most private schools we visited (particularly those whose students had participated in federal programs previously or in which the district is very explicit about restrictions) are aware of, and comply with, many of these restrictions concerning the nature and use of materials and equipment. (See Section V for a discussion of district guidelines and restrictions.)

Evaluation Practices

In the districts we visited, we saw very little evidence of districts or private schools formally evaluating the private school student component of Chapter 2, except when it was required as part of a state evaluation. In this case, each private principal often completed a short evaluation form that asks for information such as whether the planned objectives had been achieved. In addition, some private schools informally evaluated some of their Chapter-2-supported services for their own purposes; they rarely saw this as a Chapter 2 evaluation.

Role of the State Education Agency

We saw wide variation in the amount of guidance given to districts from their SEAs concerning the administration of Chapter 2 services for private school students. Some states give explicit details on every aspect of the process. In one state we visited, the SEA determined eligible private schools and counted their pupils, told the districts the amount of funds to be used to provide services to students in each private school, specified the application form that the private schools submitted to the districts, detailed the notification and waiver process, was in frequent telephone contact with districts about matters such as allowable services, and monitored the private school student component in great detail. Some states even notify the private school officials directly about Chapter 2.

Other states give less detailed guidance, such as providing a copy of the federal law and regulations, and maintain a hands-off position. This approach can be the result of state law or part of the general philosophy of the SEA. In these states, there tends to be wider local variation in administrative practices under Chapter 2.

Role of Private School Organizations

Private school organizations can play a variety of roles in Chapter 2 at the local level. In our site visits, Catholic diocesan (and archdiocesan) offices were especially active in Chapter 2; other organizations (e.g., Lutheran Synods, organizations of independent schools) tended to be less so.* Compared with other private schools, the Catholic schools have a long-standing organization; the diocesan offices represent many schools, and historically most have been involved with federal and state programs, although some deliberately avoid involvement with these programs, including Chapter 2. Below, we discuss some types of involvement we have seen on the part of dioceses.

Dioceses tend to be more involved in Chapter 2 in large cities or suburban districts, in part because these districts are located near the diocesan offices and in part because of the large number of Catholic schools involved. In other settings, where districts are many miles from the diocese, the diocese tends to have less influence.

Dioceses play a number of different roles in Chapter 2. Primarily, the diocesan personnel (often a government programs liaison or superintendent) serve as communication links or liaisons between the Catholic schools and the district regarding Chapter 2 (as well as many other programs and issues). At the same time, we have seen examples of other diocesan roles under Chapter 2:

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*This subsection focuses mainly on Catholic organizations; we have less information about the activities of other private school organizations.

- Serving as a general resource for private school principals. Diocesan staff sometimes hold meetings for these principals concerning federal programs; at these meetings, they explain the Chapter 2 program, allowable services, etc. The diocesan staff also sometimes attend the district meetings of Chapter 2 coordinators and private school principals. In addition, the principals can go to the diocese for advice about useful services, if they need advice about whether a service is allowable, or if they have a problem with a district. The diocesan staff are often well informed. In one diocese we visited, which has a very active government programs liaison, most districts in the area rely on the diocese to tell the Catholic schools about any changes in federal and state programs.

- Serving as an additional notification channel for the Catholic schools. Diocesan staff often notify the schools each year of the availability of Chapter 2 services (including information about the amount of money that the districts have available for services to private school students).

- Expediting the submission of districts' Chapter 2 applications. The diocese sometimes prods the Catholic school principals to get their applications in on time, or funnels all the Catholic school applications through the diocesan office. In several sites, this process was carried even farther by having a person (e.g., a regional Catholic superintendent or private school principal) serve as the contact person for the district. The district informs the contact person about the availability of Chapter 2 services; this person then holds meetings with his principals, notifies them of Chapter 2, and may even collect applications.

- Consolidating services (either within districts or between districts). Diocesan staff sometimes coordinate Chapter 2 services across schools within a district or among districts to provide more services or to enable a wider range of services to be offered.

- Monitoring the Chapter 2 program in Catholic schools. In several districts we visited, diocesan personnel review the Catholic schools' Chapter 2 applications before they are submitted to the district. In one state, the diocese actually conducts on-site monitoring of services for private school students under Chapter 2, and asks private school officials to keep usage logs to show whether the materials and equipment are used for nonreligious purposes, for instructional purposes, etc. We were told that typically the dioceses interpret Chapter 2 regulations conservatively and do not want to jeopardize services by having a principal misinterpret the requirements of the program.

Some diocesan staff we visited were so active that their influence extended beyond the Catholic schools; for example, one diocesan government programs liaison came to a meeting of the Lutheran principals in the area to inform them about federal and state programs.

Summary

The analyses presented in this section can be summarized as follows. First, regarding the participation of private school students:

(1) Approximately two-fifths (42%) of all districts in the nation have private schools within their boundaries eligible to have their students participate in Chapter 2; this percentage varies by district size, from 100% of very large districts (enrollment of 25,000 or more) to 16% of districts with enrollment under 600.

(2) Not all eligible private schools elect to have their students participate in Chapter 2. Overall, three-quarters of districts with eligible schools serve at least some of the private schools in their boundaries. In the average district, approximately two-thirds of the eligible private schools opt to have their students receive Chapter 2 benefits.

(3) Students participating in Chapter 2 attend both religious and nondenominational schools; Catholic schools are the most frequent source of participants.

Second, regarding local allocation of Chapter 2 funds for private school student services, we found:

(4) On average, 14% of the district's annual Chapter 2 allocation is used to pay for services to private school students, although there is a considerable range, from nearly zero to 56%.

(5) The annual amount of Chapter 2 funds available for services to students in any given private school (the unit for which purchases are usually made) is small, ranging from $2,224 per school in very large districts to $879 per school in small districts, with an overall average amount of $1,272 per school.

Third, we found the following with regard to the types of services private school students receive:

(6) In virtually all districts (92%) serving private school students, Chapter 2 funds purchase instructional materials and equipment other than computers for these students; in two-thirds, purchases include computer hardware or software.

(7) Other types of service occur much less frequently under the block grant: curriculum or new-program development, staff development, instructional programs (e.g., compensatory), and student support services (e.g., counseling) were provided to private school students in fewer than a quarter of the districts serving these students.

(8) There has been very little change in private school student services over the 3 years of the block grant.

(9) Most of these services are provided on the private school premises. (Our data collection occurred shortly before the U.S. Supreme Court's Aguilar et al. v. Felton et al. ruling; this pattern may have changed since.)

(10) Activities supported by Chapter 2 tend to benefit all students in each participating private school or all within a few grades, rather than being targeted to the special needs of a few.

Fourth, regarding the administration of these services, we found:

(11) The district activities involved in administering the private school student component of Chapter 2 are fairly routinized and differ little from procedures set up under antecedent programs, especially ESEA Title IV-B.

(12) Typically, all private schools that are, or are thought to be, eligible are notified that Chapter 2 funds are available. Consultation generally consists of informing private school officials of the amount of funds available to serve students in each school and soliciting an application (or other equivalent request) indicating how the district should spend these funds.

(13) Virtually all districts report that they monitor services for private school students to some degree, typically by checking private school applications or requests (and the resulting purchase orders) for conformity with guidelines. On-site monitoring is not common; the limited visits are generally informal. Districts tend to monitor the nature of these services, not their actual implementation.

(14) We found little evidence that districts (or private schools) are formally evaluating services for private school students, except when it is required as part of a state evaluation.

(15) The role of the SEA in guiding district administration of these services varies greatly, from states that provide detailed guidance to those that maintain a hands-off position.

(16) Private school organizations play a variety of roles in Chapter 2 at the local level; Catholic diocesan offices tend to be particularly active as liaisons between district and private schools and as supports to the principals themselves.

III ACCESS TO SERVICES

The statute and regulations for Chapter 2 state that there should be "equitable participation" of private school students, compared with public school students, in the Chapter 2 program. One issue that arises from this provision concerns equitable access--i.e., whether all eligible private schools desiring that their students participate in Chapter 2 are able to have their students participate in the program. No data are available that directly address this question; that is, there are no national figures summarizing the number of private schools that might wish to have their students participate in Chapter 2 but do not do so. However, from our data, it is possible to look at information bearing on this question. We first consider changes in private school student participation in federal programs that occurred with the change to the block grant, and then discuss the reasons why some private schools continue to have their students not participate in Chapter 2. We then assess the equitable access issue in light of this information.

Changes in Private School Student Participation With the Block Grant

Overall, for a large majority (80%) of districts that have eligible private schools (and that administer the services for students in these schools), the number of private schools with students participating in Chapter 2 has stayed approximately the same as under the antecedent programs (see Table III-1). Very few districts reported a decrease in participation with the change to the block grant. However, participation increased in a substantial number of larger districts, and especially in the very large cities (59%). We have no data on the size of any increase or decrease; for example, districts would have responded "greater" to an increase of one or many schools. It is probable that increases were more common in larger districts in part because there are more private schools in larger districts

Table III-1

CHANGE IN NUMBERS OF PRIVATE SCHOOLS WITH STUDENTS PARTICIPATING IN ANTECEDENT PROGRAMS COMPARED WITH CHAPTER 2, BY SIZE OF DISTRICT

District Size (Enrollment Range)	Percentage of districts* in which the number of private schools with students participating in Chapter 2 during the 1984-85 school year (compared with the antecedents) is...		
	Greater	The same	Less
Very large (25,000 or more)	48	43	9
Urban	59	38	3
Suburban	37	48	15
Large (10,000 to 24,999)	27	68	5
Medium (2,500 to 9,999)	18	79	3
Small (600 to 2,499)	13	87	0
All districts (600 or more)	18	80	2

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* Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

than smaller districts, so that larger districts are more likely to have had schools with students not participating in the antecedents programs.

From our data, we can only speculate about the number of private school students served under Chapter 2, but not served under the antecedent programs. Our case study evidence suggests that schools that did not elect to have their students participate in the antecedent programs, but now have students participating in Chapter 2, tend to be small. Thus, we might speculate that, of those private school students participating in Chapter 2, a large percentage also participated in the antecedent programs (primarily Title IV-B).* This pattern is supported by the statistics reported by NCES (Nehrt, 1981) that, although Catholic schools constitute 50% of all private schools, they encompass almost two-thirds of the private school students; as reported earlier, virtually all the students in Catholic schools participated in the antecedent programs (primarily Title IV-B), and probably are participating in Chapter 2 as well. Nonetheless, overall, many more private school students in more private schools have access to federal services under Chapter 2 than under the antecedent programs.

The increase since the change to the block grant seems to result from the growing participation of students in non-Catholic schools, as participation in the Catholic schools was already high. We saw many examples of students in both religious (e.g., Jewish, Muslim, Seventh Day Adventist) and nondenominational schools becoming new participants under Chapter 2. The major reasons for increased participation under Chapter 2 appear to be:

- The availability of more funds to provide services to private school students under Chapter 2.

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* The General Accounting Office (1984), on the other hand, in a study of LEAs in 13 states, found that the number of private school students served nearly doubled with the change to the block grant.

- Private school officials' perception of greater flexibility under Chapter 2.

- The perception of decreased administrative complexity under Chapter 2.

Several interesting examples of schools starting to have their students participate because of the increased flexibility and decreased administrative complexity under Chapter 2 follow:

- In a medium-sized rural county district, a Seventh Day Adventist school received Chapter 2 services for its students in defiance of its regional organization. This organization forbids its more than 60 schools to have their students participate in federal and state programs because of its policy of separation of church and state, and its belief that the government should not interfere in education. Local district personnel convinced the private school officials at this one school that there were no strings to fear in Chapter 2, and that no decisions would be forced on the school beyond reasonable guidelines. The principal now states that he likes the Chapter 2 program, and appreciates its simplicity (e.g., a one-page form). The regional office has responded by viewing this maverick school's students' participation as an experiment, and intends to reevaluate its opposition to participation in Chapter 2.

- A relatively wealthy independent boarding school in an affluent suburban district had not elected to have its students participate in Title IV-B because the administration felt that its students did not really need extra services and because of perceived administrative hassles associated with IV-B. There was a feeling that "if we accepted [federal services], controls would be put on." The principal also viewed IV-B as a program to receive books. He felt that the regulations were too confining, since the students in the school did not really need more books. However, the flexibility of Chapter 2 was enough to overcome this reluctance to have his students participate. The principal said, "Chapter 2 gave us an opportunity to provide a specialized program or service that was not otherwise provided" (Chapter 2 provided a teacher and supplies for an art program on Saturdays).

Another example also illustrates this point, although it concerns a school too new to have had its students participate in the antecedent programs:

- An independent school in a very large city at first decided to have its students participate in a state program of aid for private school students but not in Chapter 2 because its school board thought that Chapter 2 would be complicated and not worth the bother for the relatively small amount of services involved (approximately $1,000 was available for these services). This impression was based on hearsay; the board had heard that getting "Title [services]" was hard, required paperwork done in triplicate, came with strings attached, etc. However, after talking to district personnel, the principal realized that his students' participation in Chapter 2 was simple and that few strings were attached. This school now has its students participating in Chapter 2.

Some districts also may have made a greater attempt to encourage the participation of private school students in Chapter 2 than under the antecedent programs. Often, this change may have been an indirect result of the greater emphasis on private school student participation by the U. S. Department of Education, which has filtered down through the states (perhaps in the form of monitoring), leading to greater local outreach--e.g., information dissemination, follow-up, etc. However, this is not true in all states, such as those with a long history of private school student participation in state and federal programs (in which outreach was already high), or those with state restrictions concerning interference with the affairs of private schools.

Other reasons for increased participation include idiosyncratic factors. For example:

- A Christian school whose students had not participated in the antecedent programs elected to have its students participate in Chapter 2 because of a change in personnel on the governing board to individuals less opposed to accepting federal services.
- In several sites we visited, new schools were opened as districts underwent desegregation. Although many of these are not eligible for Chapter 2, some are eligible, and their students participate.

We saw some evidence of a growing awareness and interest among private school officials in Chapter 2 over the 3 years of the program, resulting in a trickle of private schools electing to have their students join the program each year. For example, in one state we visited, of the 55 schools in an association of independent schools, an estimated 15 have students who participate in Chapter 2; this number is growing, according to a representative of this organization:

> Originally [the schools] didn't care; then they didn't know what was available. Then some heard of examples where it worked. [Schools learn about Chapter 2] through principals' meetings once a month. I've always kept them informed. After one or two have taken part, others see the advantages. Soon their boards get interested, they talk to a lawyer, and then go for it. It's a gradual process. I think more will apply next year.

This individual went on to say that the schools he represented liked Chapter 2 better than other federal programs because of the lack of federal control.

Nonparticipants in Chapter 2

Many eligible private schools still elect not to have their students participate in Chapter 2. The main reason seems to be philosophical opposition to participation in government programs. We learned of private school officials in both denominational (including Seventh Day Adventist, Southern Baptist, and Christian Fundamentalist) and nondenominational schools that felt this way. Some of these schools oppose participation in all federal or state programs; for example:

- A Christian school in a very large city does not accept state or federal services (other than transportation) because its board decided that it did not want to depend on a secular government to run a Christian school. There is a general fear of control by the government. For example, under a state program, the district could provide personnel to work with private school students, but the school wants its employees to be born-again Christians. In addition, this school wants to select its own texts "on a spiritual basis."

- A principal of a Christian Fundamentalist school in another district, when approached about his students' participation in federal programs, told the Chapter 2 coordinator that he did not want to be involved in the "devil's work."

- A librarian in a Catholic high school told us that the librarian from an elite private school "called me to find out how to get the Chapter 2 [services], but the board [of the school] was afraid that the federal government wants to try to run the school."

Some private schools are willing to have their students participate in certain federal or state programs, but not in others. For example, one Christian school in a medium-sized district we visited has elected to have its students participate in Chapter 1, but not in Chapter 2. The distinction made by the school's administrators points up a common perception of Chapter 2 by private school personnel. Chapter 2 is often thought of as a "pot of money" available to provide services to private school students. Personnel in this school feared the government strings and control that might accompany these services, such as interference with the selection of books provided. On the other hand, Chapter 1 is sometimes seen (incorrectly) as more directly providing services (e.g., the district might ask the private school personnel if their students need to have a remedial reading teacher come to the school several times a week); the private school personnel in this school said that there is less possibility of government interference with such services.

As previous examples in this discussion imply, private school organizations can encourage or discourage philosophical opposition to federal programs. Some private school organizations actively encourage or demand participation; for example, a diocesan representative commented that all Catholic schools in the diocese have their students participate "or they would be in trouble with me." Others specifically do not adopt a policy, while still others take a stance opposed to participation. One state's Conference of Seventh Day Adventists, for example, has a long-standing policy (at least 100 years old) of not accepting any federal or state services, in order to maintain separation of church and state. But even when organizations have a policy in opposition to participation, some schools ignore it (as described earlier).

Another major reason for nonparticipation is the small amount of money available to provide Chapter 2 services for students in some (particularly very small) private schools. For example, we talked to the principal of a very small independent school (currently enrolling 29 students) for children with developmental difficulties; he does not elect to have his students participate in Chapter 2 because he feels that the very small amount of services involved (currently $240 is available for these services) is not worth the paperwork and bother, however minimal. In another district, a principal of a private school with five students also felt that the level of services available was not worth his effort. The Chapter 2 coordinator in a third district said, "We had one [school] one year that said it's not enough to bother with--$50."

There are other less salient reasons for nonparticipation. For example, private schools are often small and have principals who also teach; in addition, many private school principals have to work as fundraisers for their schools. These principals tend to be heavily burdened with work and may just not have time to deal with Chapter 2. For example, the principal of a Christian school said, "This is not just a school, but a business, so the time factor limits my involvement." Echoing this sentiment, a representative of an independent schools association said that many principals are "swamped," and letters from the district tend to wind up on the "bottom of the pile."

A lack of outreach on the part of local districts does not seem to be a major factor in nonparticipation. In the districts we visited, all eligible schools were notified about Chapter 2. The amount of follow-up varied, however. In some districts, Chapter 2 coordinators do a considerable amount of follow-up; for example, one Chapter 2 coordinator said:

> We call them some. They have limited staff, and the [private school] contact person may be overextended. We had one--we couldn't get any response after repeated calls. My secretary stopped calling because she was embarrassed, and I had to. They swore they would send it in, so something was hand-delivered.

Follow-up seems to be more common when it is mandated by the state, such as when districts are required to get signed waiver letters from schools that do not want their students to participate. On the other hand, in many districts, follow-up is not necessary; many schools (e.g., the

Catholic schools) have a long history of student participation in federal and state programs and do not need encouragement to have their students participate in Chapter 2. In many other districts, follow-up would be futile; many private schools have never elected to have their students participate in government programs and have told districts that nonparticipation is a matter of principle. Some districts' follow-up efforts are further limited by state law forbidding intrusion into the affairs of private schools.

Even extensive follow-up does not necessarily increase participation. For example:

- In one district, a private school affiliated with the Church of God had not had its students participate in the antecedent programs. The Chapter 2 coordinator doubted that it would be eligible for Chapter 2, because she thought it discriminated, but sent a few letters anyway to inform this school about Chapter 2. After no response, the Chapter 2 coordinator sent a registered letter, but it went unclaimed. She tried telephoning, but her calls were not returned. When she finally got through and identified herself as being from the district, the school personnel hung up. She finally telephoned a member of the church, who contacted the pastor, who contacted the school's principal; this still resulted in no response. When the Chapter 2 coordinator called again, the person who answered hung up on her. "They don't want to communicate, and they don't want our [services]," the Chapter 2 coordinator said. "I sent them attendance and registration forms, regulations and applications for Chapters 1 and 2, and all sorts of program descriptions. They won't even talk to me. It's a real pain."

Is Access Equitable?

In sum, Chapter 2 reduced some of the disincentives for private schools concerning their students' participation in federal programs (e.g., limited flexibility, limited money available for services to private school students); for this reason, more private schools have students participating in Chapter 2 than in the antecedent programs. For those schools that are eligible but whose students are not participating, the major reasons are not "access" problems. That is, the reasons for nonparticipation do not lie in a lack of outreach by the public school sector; eligible private schools are generally aware of Chapter 2 and decide not to have their students participate. The reasons for nonparticipation (philosophical objections, small amounts of money available for services to students in schools with low enrollments) cannot be changed by more outreach. In fact, many of the current nonparticipants would not want their students to participate in any government program, because of their philosophical objections or small size. Thus, we could conclude that there is generally little access problem under Chapter 2.

However, we must provide a caveat concerning the adequacy of districts' lists of eligible schools. As described earlier, districts are sometimes given a list of eligible (or all) private schools within their boundaries by the state; otherwise they have to compile this list from other sources. The accuracy of these state lists can vary, through either omission of schools, or incorrect determination of eligibility. In one state we visited, a state list of accredited schools is updated at least yearly, using several sources. But in other states, we heard about lists with omissions or inaccuracies. One state lists schools that are considered automatically ineligible for Chapter 2 because they historically resisted integration; no one knew whether this list had ever been updated. In a district in another state, the SEA's list had omitted a very small school until recently, perhaps because the SEA was unaware of its existence; once it was put on the state's list, its students participated in Chapter 2. In a district in yet another state, the Chapter 2 coordinator complained, "Every year, the state gives us the wrong list," including schools that are outside the district's boundaries. "It's tough getting them [the schools outside the district] off the state computer."

In states where it is up to the district to locate eligible private schools, districts face the problems of locating the private schools within their boundaries (a particular difficulty in large districts), as well as determining eligibility. In addition, these districts may have little incentive to search out additional schools.*

Summary

The highlights of our analyses regarding private school students' access to Chapter 2 services are as follows:

(1) The majority of districts nationwide report no increase in the number of private schools with students participating in Chapter 2, as compared with antecedent programs. Few districts indicate decreased participation by private school students. Increased participation is especially likely in very large urban districts.

(2) Increased participation by students from non-Catholic schools appears to account for most of the change in participation since before the start of the block grant.

(3) Private schools electing to have their students participate for the first time cite three major reasons: (a) the availability of more funds for these services, (b) a perception of greater flexibility under Chapter 2, and (c) a perception of decreased administrative complexity. Some districts also have made a greater effort to encourage the participation of private school students in Chapter 2 than under the antecedent programs.

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*However, if a district located an eligible private school that then declined to have its students participate, the funds generated by those students might be used to serve public (as well as possibly private) school students (see Section IV).

(4) Many eligible private schools elect not to have their students participate in Chapter 2, usually because of philosophical opposition to participation in government programs or the small amount of money available for services their students might receive.

(5) Lack of outreach on the part of districts does not seem to be a major factor in the nonparticipation of private school students.

(6) There is little evidence that private school students are systematically denied access to services under Chapter 2; however, it is possible that the inadequacy of districts' private school lists (which often stems from a lack of information at the state level) may reduce the likelihood of certain schools being notified about the availability of services.

IV EQUAL PER PUPIL EXPENDITURES

The "equitable participation" requirement of Chapter 2 is typically interpreted as equal per pupil expenditures for services to public and private school students. Chapter 2 regulations state that "Expenditures for Chapter 2 programs for children enrolled in private schools must be equal (consistent with the number of children to be served) to expenditures for Chapter 2 programs for children enrolled in the public schools of an LEA, taking into account the needs of the individual children and other factors that relate to such expenditures." In this section, we will first look at whether the per pupil expenditures for services to public and private school students are equal. We will then look at how certain interpretations of various aspects of the allocation process can result in inequalities. Next, we will consider those factors leading districts to provide equal expenditures. Finally, we will consider the consequences of fiscal equality for public school districts.

Equality of Expenditures

Overall, 94% of districts reported that the current per pupil expenditures under Chapter 2 for services to public and participating private school students were equal; 4% reported that the per pupil amount for public school students was higher, while only 1% reported a higher amount for private school students (see Table IV-1).* These data suggest that the vast majority of districts are providing equal per pupil expenditures, clearly meeting the intent of the law. Equal per pupil expenditures are more common in small districts than in larger ones.

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* The percentages do not add up to 100% because of rounding errors.

Table IV-1

PER PUPIL EXPENDITURES FOR SERVICES TO PUBLIC AND PRIVATE SCHOOL STUDENTS UNDER CHAPTER 2, BY SIZE OF DISTRICT

District Size (Enrollment Range)	Percentage of districts* in which the per pupil expenditures for services to public and private school students in the 1984-85 school year are ...		
	Equal	Greater for public school students	Greater for private school students
Very large (25,000 or more)	88	8	4
Urban	87	11	2
Suburban	89	6	6
Large (10,000 to 24,999)	92	4	4
Medium (2,500 to 9,999)	92	6	2
Small (600 to 2,499)	99	1	0
All districts (600 or more)	94	4	1

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*In districts having one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

From these data, it is difficult to interpret the magnitude of the inequalities that were reported; some per pupil differences may be large, while others may be trivial.

The above data represent mainly the Chapter 2 formula allocation to districts. From our data, it is not possible to ascertain whether private school students nationally are served with an equitable share of the states' Chapter 2 set-aside money. However, we did see several cases in which districts received money for grants (either competitive or noncompetitive) of the state's discretionary money.* Private school students did not participate in the programs funded by these grants, either because they were not invited or because they were invited but found the activities inappropriate. For example, in one district that received a competitive grant funding videotape equipment and a videotape library for a consortium of districts, students in a local private school servicing grades 1-8 do not participate because most of the programming is aimed at high school students.

In states we visited that used Chapter 2 state set-aside funds to support technical assistance or inservice, we saw indications of limited private school staff participation, either because the help was not offered to private school staff, because information about the aid was not widely disseminated to private school officials, or because the help was perceived as irrelevant. However, there are exceptions to these patterns. For example, in one state, private school organizations lobbied the SEA to provide services from the state's Chapter 2 set-aside, resulting in a series of workshops aimed specifically at private school personnel and including topics such as computers and extended day care.

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*Nationally, only an estimated 2% of all districts received state discretionary Chapter 2 funding in the school year 1984-1985. See Apling and Padilla (1986).

Interpretations of Allocation Requirements That May Result in Unequal Expenditures

There are several areas of the allocation process in which certain interpretations can result in unequal per pupil expenditures for services to public and private school students. These are discussed below.

Expenditures Based upon the Differing Needs of Public and Private School Students

According to Chapter 2's regulations, a district could justify unequal expenditures based upon the differing needs of the public and private school students. However, the Chapter 2 law and regulations do not specify when unequal expenditures would be justified or whether the differences in need must be documented, for example, with a formal needs assessment.

In our site visits, we saw no examples of districts spending unequal per pupil amounts of Chapter 2 funds based on differing needs of public and private school students. One state interpreted the Chapter 2 regulations to mean that districts had to distribute the money generated by high-cost students "equitably" to benefit public and private school students; however, districts had the option to base the distribution either on relative public/private enrollments or on "differences in the cost per child of meeting the needs of the individual children to be served and other factors that relate to these expenditures" (State Guidelines).* According to state-level personnel, not a single district in the state had chosen the second method of distribution, probably because the alternative is very complex, since the private school officials must be consulted and additional forms in the application must be completed. State-level staff also speculated that the districts went along with equal expenditures to maintain harmony with the private school sector. The Chapter 2 coordinator in one of the largest districts in this state confirmed this perception; he told us that the second method was "a joke...how do you do this with 40 private schools [with students participating in Chapter 2]?"

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* In this state, Chapter 2 formula money is distributed on an equal per pupil basis automatically.

Funds Generated by High-Cost Factors

Unequal per pupil expenditures could also result if Chapter 2 funds followed the students who generated them. Although federal regulations (and Nonregulatory Guidance) for Chapter 2 state that the determination of equal expenditures "may not take into account the extent to which children in private schools generated a portion of the LEA's allocation...(relating to 'high-cost' children)," there is still confusion on this issue, as other research suggests (American Association of School Administrators, 1984). In our site visits, we saw only one example of a district in which the high-cost money followed those who generated it.

In the districts we visited, distinctions were seldom made between high-cost money and the rest of the district's Chapter 2 allocation; high-cost money generally was allocated for services to public and private school students on an equal per pupil basis, often as a result of state guidelines. For example, in one state we visited, the state Chapter 2 formula included a weighting for desegregation activities. We visited a district in this state that had not participated in ESAA but had implemented various desegregation activities, thus generating some high-cost Chapter 2 money. The state specified the expenditure for services to students in private and public schools on an equal per pupil basis; thus, although there was some resentment on the part of district officials, the high-cost money was shared equitably.

We saw an example of controversy over a related issue in another state we visited. During the first 2 years of Chapter 2, this state had a special provision under which districts that had received ESAA funds were compensated with extra Chapter 2 money. Many districts in the state believed that this money did not need to be expended for services to students in private schools, which typically had few, if any, desegregation problems. However, the SEA "put its foot down" and said that this money should be expended equitably; the districts we visited in this state thus used some of this money for services to students in private schools.

Funds Available to Serve Private School Students That Do Not Participate

The disposition of funds available to serve students in private schools that have declined to have their students participate in Chapter 2 can affect the equality of the per pupil expenditures for students in public and private schools. There seems to be some variation in the distribution of these funds. Overall, most districts (65%) distribute these funds for services to both public and private school students (see Table IV-2).

Unequal per pupil expenditures for public and private school students can result if this money is reallocated to serve public school students only, or if it is reallocated to serve only participating private school students. The differences can be small or large, depending on the number of nonparticipating private school students. For example, in one medium-sized suburban district we visited, there were approximately 3,800 public school students and 1,079 private school students. However, only one of the five eligible private schools had students who participated in Chapter 2. This district expended the money intended to serve the nonparticipating private school students on public school students, resulting in a substantially different per pupil expenditure (public: $8.59; private: $7.54). The SEA realized that this type of reallocation was occurring in some districts in the state, but seemed to look the other way.

The public and private per pupil amounts are equal only when the money for nonparticipants is divided in proportion to the number of students in public and participating private schools. According to some respondents in the public sector, this procedure can be very elaborate and not worth the extra paperwork, compared to expending these funds on public school students only. For example, in a large city in one state we visited, 314 private school students (of a total of 23,563) did not participate in Chapter 2.

Table IV-2

DISPOSITION OF FUNDS FOR SERVICES TO PRIVATE SCHOOL STUDENTS THAT DO NOT PARTICIPATE IN CHAPTER 2, BY SIZE OF DISTRICT

District Size (Enrollment Range)	Percentage of districts* in which funds that would have been used to serve private school students are... Expended for services to participating private school students only	Expended for services to public school students only	Expended for services to both public and participating private school students	Other**
Very large (25,000 or more)	9	22	67	2
Urban	9	27	64	0
Suburban	6	16	75	3
Large (10,000 to 24,999)	2	23	72	3
Medium (2,500 to 9,999)	2	19	70	8
Small (600 to 2,499)	0	21	48	31
All districts (600 or more)	2	20	65	12

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* Among districts serving private school students in which some private schools do not elect to have their students participate, and in which funds are initially set aside to serve students in all private schools.

**This category includes funds that are retained by the state and never forwarded to the district; however, we have no further information on the disposition of these funds.

With the equitable reallocation process, the per pupil expenditure for services for private school students would increase $.03 per student in each of 64 participating private schools, an increase of between $1.85 and $37.05 per private school for services to its students, and a total gain for private school services of $729.37. State personnel felt that this minimal increase for services to students in any individual private school did not justify the substantial increase in paperwork involved in refiguring the allocation for students in each of the 64 schools.

Administrative Costs

Differential administrative cost charges can result in inequalities in per pupil expenditures for public and private school students. Under Chapter 2's Nonregulatory Guidance, districts are allowed to recover administrative costs for implementing and monitoring the private school student component. This issue tends to be more significant in larger districts than smaller districts. For example, more than 20% of respondents in very large or large districts reported that the district had a problem with the unreimbursed administrative costs of providing materials or services to private school students; only 3% of those in small districts reported similar problems.

In the districts we visited, some took a portion (ranging from 2% to nearly 20%) of the Chapter 2 money available for services to private school students to cover administrative expenses; others did not. Overall, those districts that took administrative expenses tended to be the larger districts; they either took a flat percentage off the entire Chapter 2 grant for services to private school students, or had calculated unit cost rates for various items, such as purchase orders, payroll checks, etc. Those that did not take administrative expenses tended to be smaller districts with fewer private schools, where less work is involved in dealing with the private school student component. For example, the Chapter 2 coordinator in a suburban district with six private schools with participating students said that the district does not charge for the administration of the private school student component because it involves such a small amount of money and a simple application, and "does not take a significant amount of time." However, the Chapter 2 coordinator felt that if the district provided Chapter 2 activities in more areas (currently, it is providing services in only two areas), it would be "a headache" for the treasurer and the purchasing staff, because more accounts would have to be set up, creating more complex accounting. He added, "In that event, we would have an administrative charge-back, but not now."

If administrative expenses are taken for services to private but not public school students, or vice versa, unequal per pupil expenditures can result. We saw examples in both directions. In one city district, 17.5% was taken only out of the Chapter 2 funds available for services to private school students for indirect administrative costs. In addition, we saw a few examples where administrative expenses were taken only out of the public school share, resulting in higher per pupil amounts for services to private school students. However, in most of the districts we visited that charged for administration, administrative cost rates were the same for both the public and private school sectors, often as a result of state guidelines covering many federal programs.

Equal rates, however, do not guarantee equal per pupil expenditures. Even if the LEA charges the same unit cost rates for serving public and private school students, unequal per pupil expenditures can result if the LEA is providing different types of Chapter 2 activities for these students. For example, in a very large city we visited, the LEA provided mainly materials and equipment for private school students and mainly personnel for the public school students. Since warehousing and delivery are very expensive, while unit costs attached to personnel are lower, more administrative money was charged for providing the services to the private school students, resulting in a lower per pupil expenditure for those students.

District Administrative Decisions

Districts could also decide not to provide equal per pupil expenditures for other reasons. For example, in one district we visited, district officials decided to expend a substantially greater amount per pupil to serve public school students than private school students, because they felt too much money would otherwise go to services for private school students (the former ESAA grant had not been used to purchase services for these students).

Factors Leading to Equal Per Pupil Expenditures

From our data, we cannot conclusively determine which types of districts provide equal per pupil expenditures and which do not. However, in considering those districts in which the per pupil expenditures for public and private school students have differed, one major factor stands out: the role of the state education agency. The SEA specifies the amount of funds to be expended for services to private school students, or the formula by which this amount should be calculated, in 78% of the districts that enroll at least 600 students.

When the state is very specific, districts have little discretion or confusion over per pupil expenditures; in fact, we were told by a Chapter 2 coordinator that, because the state tells the district the exact amount to be expended for services to students in each private school, "We don't feel that the [funds for services to private school students] are ours to begin with." From our site visits, it seems that when the state is specific, equal per pupil expenditures are more common.

On the other hand, when the state guidelines are more ambiguous (e.g., simply stating that expenditures for services to public and private school students should be equitable) or when the state guidelines are not enforced, there seems to be more variability among districts in per pupil expenditures. In some of these districts, district personnel bend over backwards to provide equal expenditures, such as the Chapter 2 coordinator in a small rural district who said, "The odd dollars [left over from calculating equal per pupil amounts] would also go to [services for students in private schools] to make sure we could not be accused of not giving them an equitable share." Equality in expenditures probably is also enhanced in districts with a long history of private school student participation in state and federal programs, in which personal relationships have been built up over the years. However, equality is strained in districts that lost large amounts of money with the change to the block grant. For example, several private school representatives told us that they believed that districts were taking administrative costs out of the Chapter 2 funds available for services to private school students to make up for the districts' loss of ESAA funds; one private school principal told us that "the district has penalized us for getting [services from] money that used to be theirs."

Consequences of Fiscal Equality

Chapter 2's provisions for equal per pupil expenditures for public and private school students have raised concerns in some public school districts, mainly because of the redistributive nature of Chapter 2. With the change to the block grant, funds often were diverted from large urban districts participating in ESAA; among the "winners" of services from this money were students in private schools.* The fact that students in private schools gained under the block grant was evident in many of the sites we visited. We heard comments from public school respondents such as, "Chapter 2 was a big windfall for the [private school students]," who "made out like bandits." We saw many examples where expenditures for services to private school students had increased many times over expenditures under the antecedent programs (primarily Title IV-B). For example, in one city we visited, the expenditures for services to private school students increased from $2,387 to $12,075, for approximately the same number of students. Increases at the level of individual private schools ranged greatly. Some private school principals were well-aware of the increase; the principal of a private school with a threefold increase for services said that, when the block grant started, "we walked around smiling." However, school-level personnel were not always aware of an increase, because the absolute amount (both before the block grant and under Chapter 2) was often so small.

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*The redistributional effects of Chapter 2 vary by state; these effects can be mitigated by state allocation formulas.

In certain types of districts, a larger percentage of the district's allocation is available for services to private school students than under the antecedent programs. Although overall, the majority (71%) of districts report no change, as shown in Table IV-3, there is a substantial number (particularly the very large urban districts) for which the proportion expended for services to students in private schools has increased. This is mainly due to the fact that many of these larger districts participated in large antecedent programs, such as ESAA, which had little private school student participation; with the block grant, these districts lost a considerable amount of money and had to make more of their decreased allocations available for services to private school students. In fact, our data show that 53% of the districts that had participated in ESAA use a larger proportion of Chapter 2 funds than antecedent program funding to provide services to students in private schools; only 24% of those districts that had not participated in ESAA do so.

In some districts we visited that had lost ESAA funding, public school personnel expressed some concern about equal per-pupil expenditures for public and private school students. However, not all districts we visited that had participated in ESAA expressed this concern over equal per pupil expenditures. District personnel were less upset when the desegregation programs funded by ESAA had been completed, or were nearing completion, before the block grant, or when the district could absorb the ESAA programs with local money.

Table IV-3

CHANGE IN PROPORTION OF FUNDS AVAILABLE TO SERVE STUDENTS IN PRIVATE SCHOOLS, FROM ANTECEDENT PROGRAMS TO CHAPTER 2 (1984-85 SCHOOL YEAR), BY SIZE OF DISTRICT

	Percentage of districts* in which the proportion of funds available to serve students in private schools:		
District Size (Enrollment Range)	Increased	Stayed the same	Decreased
Very large (25,000 or more)	57	43	0
Urban	70	30	0
Suburban	42	58	0
Large (10,000 to 24,999)	33	64	2
Medium (2,500 to 9,999)	25	70	5
Small (600 to 2,499)	23	75	2
All districts (600 or more)	26	71	3

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*Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

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Some personnel in non-ESAA districts also expressed concern about equal per pupil expenditures, for example, where:

- High-cost or special money generated by the public school student characteristics or activities (e.g., related to desegregation) had to be expended (in part) for services to private school students.
- Private school student participation had grown with the change to the block grant.
- Private school students were perceived to be less needy than the public school students.

Most districts we visited, however, philosophically accepted using the Chapter 2 money equitably to provide services to private school students; respondents often told us, "it's the law" or "we play by the rules."

Summary

The analyses in this section support the following findings about the equality of expenditures for public and private school students under Chapter 2:

(1) The vast majority (94%) of districts nationwide spend an equal amount per pupil of their Chapter 2 allocations on services to public and private school students. Our data do not enable us to determine whether local grants of state discretionary money are also shared equally in all districts that receive these grants; however, there clearly are instances where private school students are less involved in the services these funds purchase.

(2) Unequal expenditures per pupil for public and private school students could arise as a result of:

   (a) Adjusting spending in accordance with differing student needs, where needs were differentially distributed across public and private schools.

(b) Allocating high-cost funds to services in proportion to the students that generated these funds.

(c) Reallocating funds that would have gone to nonparticipating private school students to either students in the public schools or the participating private schools, but not both.

(d) Differentially charging the costs of administering the public and private school student services.

(e) Making an administrative decision not to make available the full amount of funds for services to which private school students are entitled.

(3) Equal per pupil expenditures seem to be more common when SEAs are specific about the allocation process.

(4) With the change to the block grant, more money became available to provide services to private school students.

(5) In certain types of districts (especially large urban districts that had formerly received ESAA grants), a larger proportion of the district's allocation is available for services to private school students than under antecedent programs. The majority (71%) of districts serving private school students, however, do not report that an increased proportion of their funds goes for these services.

(6) Local concern about equal per-pupil expenditures for public and private school students is heard in some former ESAA districts; it is also heard in districts where:

(a) High-cost or special funds generated by public school student characteristics or activities (e.g., related to desegregation) are expended for private school student services.

(b) Private school student participation has grown.

(c) Private school students are perceived as less needy than public school students.

V EQUITABLE SERVICES

As described in the previous section, the "equitable participation" requirement of Chapter 2 is typically interpreted as equal per pupil expenditures for services to public and private school students. However, Chapter 2 also requires that private school students receive "services on an equitable basis." As part of this requirement, the regulations state, "If the needs of children enrolled in private schools are different from the needs of children enrolled in public schools, an LEA shall provide Chapter 2 services for the private school children that address their needs on an equitable basis." Thus, another issue surrounding the private school student component of Chapter 2 concerns whether the services received by private school students are equitable and appropriate to their needs.

One may judge the equitability of the services for public and private school students in two ways: (1) by examining whether private and public school students are provided with similar activities under Chapter 2, and (2) by determining whether the services provided to both sets of students are appropriate to their needs. In fact, the existence of two ways of determining equitability can put districts in a bind, as previous experience with Title I (a program with similar private school student participation requirements) suggests:

> When asked about providing a different mix of services to nonpublic school students, some public school administrators argue that they can be accused of not living up to the law whichever route they take. If they provide nonpublic school students the same services as public school students it could be said they are not taking into account the 'special educational needs' of nonpublic students. If, on the other hand, a different mix of services were to be offered, it might appear that 'equal services' were not provided. (Jung, 1982, pp. 31-32)

In this section we first compare the similarity of the services provided to private and public school students under Chapter 2. We then assess appropriateness indirectly by examining the constraints placed on the range of services made available to private school students. Finally, we address changes in equitability with the change to the block grant.

Comparison of Services for Private and Public School Students

On average, private school students receive a narrower range of Chapter 2 services than their counterparts in public schools as suggested by the data in Table V-1. Private school students are provided instructional materials and equipment (other than computers) more frequently than are public school students. By contrast, public school students more frequently are exposed to computer applications, curriculum or new-program development, student support services, instructional programs, and staff development supported by Chapter 2.*

Some districts seem to believe that providing the same services for both public and private school students meets the requirement of equitability. Nearly two-fifths (38%) of districts that enroll at least 600 students report that they inform private school personnel that Chapter 2 funds have to be used for the same things as provided by the LEAs to their public school students under Chapter 2 (although not necessarily because of equity concerns). However, from the data presented in Table V-1, we could conclude that, overall, public and private school students are not provided similar services under Chapter 2, and to this extent may not be receiving "equitable" services.

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*As discussed previously, the percentage of districts in which staff development is provided for staff in private schools by Chapter 2 may be underestimated.

Table V-1

COMPARISON OF SERVICES TO PUBLIC AND PRIVATE SCHOOL STUDENTS

Type of Activity	Percentage of districts* in which each activity has been supported by Chapter 2 funds in the last 3 years for...	
	Public school students	Private school students
Computer applications	88	68
Other instructional materials and equipment	80	92
Curriculum or new program development	37	22
Student support services	24	9
Instructional programs	24	6
Staff development	39	11

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* Among districts (with enrollment of at least 600) with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

Similarity of services are not a guarantee of equitability. As described earlier, private school personnel sometimes do not participate in activities funded for the public school districts through Chapter 2 discretionary grants, because they are irrelevant to their needs. In addition, we saw many examples of district personnel inviting private school staff to attend staff development activities provided for the public school staff with the portion of the Chapter 2 funds available to provide services for public school students. In many cases, the private school staff did not attend these activities, for the following reasons:

- The activities sometimes were offered during the day, and the private school staff had no release time; in addition, Chapter 2 cannot be used to pay for private school substitutes.
- Private school teachers sometimes could attend on only a "space available" basis; public school teachers had first priority.
- Private school staff rarely were involved in planning these activities or determining the topics. Because the activities were geared mainly to public school needs, private school personnel sometimes found the topics irrelevant, e.g., workshops on specific discipline problems or bilingual education in districts where these did not apply to private school students, or inservice regarding microcomputers purchased by the district that were not the same as those provided for the benefit of private school students.

One suburban district we visited was an extreme example of the fact that similar services are not necessarily equitable. This district is interpreting the equitability requirement of Chapter 2 as requiring that a district need not offer any services to private school students that it is not offering to public school students under Chapter 2. This district is using its entire Chapter 2 grant (intended for services for public and private school students) to fund staff development. These staff development activities are open to private school teachers but are not aimed at their needs and are offered at inconvenient times. Because of this interpretation, no other services are provided for private school students or staff. This district's interpretation of Chapter 2 regulations is not unique; we were told of other districts that have interpreted Chapter 2 this way, but usually private school officials can find something their students need within the restrictions.

Appropriateness of Services

The second way of addressing equitability involves determining whether the services received by private school students are as appropriate to their needs as are those received by public school students. It was beyond the scope of our study to investigate the appropriateness of services directly, for either public or private school students. However, some indirect evidence can be assembled by assessing whether decisions about services for private school students were constrained by the district and whether these services are what private school officials believe their students need. We describe these analyses next, followed by an assessment of equitability from this perspective.

District Constraints on the Range of Services for Private School Students

District practices vary widely in terms of the guidance given the private school officials regarding the use of Chapter 2 funds for services for their students, as is shown in Table V-2. The first type of guidance, concerning using Chapter 2 for secular purposes, is a legal requirement of Chapter 2, and approximately one-third of districts with religious schools report that they provide this guidance. However, this guidance cannot be viewed as restricting the options of the private school sector under Chapter 2. Officials in virtually all the religious schools we visited are well aware of this legal requirement and do not view it as a restriction; for example, one private school respondent told us that this requirement is "like a given."

The other types of guidance enumerated in Table V-2 are not required under Chapter 2. There is evidence that districts often guide the private school officials, and in so doing tend to restrict private school students to receiving materials and equipment under Chapter 2. As the table shows, in approximately a third of the nation's districts, private schools have been told that Chapter 2 funds cannot pay for personnel, or can be used only for books, materials, or equipment.

Table V-2

DISTRICT GUIDANCE TO PRIVATE SCHOOL OFFICIALS REGARDING THE USE OF CHAPTER 2 FUNDS FOR THEIR STUDENTS

Type of Guidance	Percentage of districts* in which guidance is provided
Chapter 2...	
Can be used only for secular purposes**	32
Cannot pay for personnel	31
Can be used only for books, materials, equipment	39
Has to be used for the same things as provided to private school students under antecedent programs	11
Has to be used for the same things as provided to public school students under Chapter 2	38
District has not provided any particular guidance	14

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* Among districts (with enrollment of at least 600) with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

** Only in districts that have one or more religious schools with students participating in Chapter 2.

Some districts (11%) reported that they have told private school personnel that Chapter 2 services must be the same as those provided to private school students under the antecedent programs. From our site visits, we saw this restriction mainly in districts that treated Chapter 2 as a continuation of Title IV-B and passed this perception on to the private school officials. However, we also saw this restriction in some cases where the public school district has interpreted Chapter 2 more broadly for public school students, yet has restricted private school students to IV-B activities.

In a larger proportion of districts (38%), private school personnel have been told that Chapter 2 services must be the same as those provided to public school students under Chapter 2. This practice may reflect the fact that many districts use Chapter 2 for materials and equipment for public school students and believe that it is easier to administer or more equitable to provide the same services for private school students.

LEA guidance given to private school officials can take many forms. It can be a formalized requirement:

- In one very large city, the district has told private school personnel that Title IV-B has just changed its name to Chapter II-B [sic]; the district gives the private school officials a list of services allowable under Chapter 2, which includes only materials and equipment. Public school services are not limited to this list.

It can be communicated verbally:

- A Chapter 2 coordinator "pooh poohed" expenditures for personnel; he added, "an additional teacher--they know my feeling."

Restrictions can be more subtle:

- In a suburban district, the Chapter 2 coordinator's informational letter to the private school principals announcing the availability of Chapter 2 services states, "We are assuming that all schools wish to use Chapter 2 funds for the purpose of purchasing instructional equipment (hardware) and library/instructional materials (software). Any school wishing to use these funds for other qualifying programs should contact...[the district] for further information and procedures." However, these restrictions are not hard and fast; if private school personnel ask, Chapter 2 funds can be used for other services for their students.

- In some districts, private school principals were told by district personnel that Title IV-B had simply changed its name to Chapter 2. However, this belief is not restricted to the private school sector; some district personnel also believe that Chapter 2 is essentially an extension of Title IV-B.

Although not necessarily restrictive, influence can also be informal:

- In one district that was using Chapter 2 money to purchase equipment for the public schools, private school principals were told that their students could receive whatever services they needed (within the Chapter 2 guidelines); however, if their students received the same equipment as the public schools, the district could purchase it with a volume discount, which can be very important to a small private school.

We also saw examples where districts did not guide private school officials toward materials and equipment. (As can be seen in Table V-2, 14% of districts indicated that they give no guidance.) For example, in some states, the private school officials fill out the same application form as the public school officials, on which are listed all the areas in which Chapter 2 services are available. In one district in such a state, the Chapter 2 coordinator goes over each area of Chapter 2 with the private school principals; he does not promote specific ones. However, even in these states, districts can place subtle or informal restrictions on services for private school students.

Private School Factors Constraining the Range of Services

The district is not the only outside force exerting pressure on private school officials. Private school organizations--in particular, the dioceses--sometimes provide guidance to private school officials concerning services under Chapter 2. In some cases, these groups try to expand the options available for private school students, particularly if the district has tried to be restrictive. On the other hand, we also have seen cases of these groups promoting materials and equipment, as in one state where the state Catholic organization advised the dioceses and the Catholic school officials to obtain materials and equipment for their students under Chapter 2 so that the private schools could not be accused of trying to get special benefits from Chapter 2.

External guidance or constraints are not the most important determinants of services for private school students. The private school personnel we interviewed identified three main factors determining services to private school students under Chapter 2, which both narrow the range of viable options and lead in the direction of materials and equipment:

- Small amount of Chapter 2 funds available for services to students in a given private school.
- Critical needs and tight budgets in many private schools.
- Tradition of service under the antecedent programs.

The first, and most important, factor is the typically small amount of Chapter 2 funds available to provide services to students in a given private school. Many private schools are relatively small, and their students generate a small amount of Chapter 2 funds. As we explained in Section II, private school students usually receive services funded by Chapter 2 money on a school-by-school basis. The median annual amount of funds available for serving students in each private school is only $1,272 (with a maximum of $7,500)--typically not sufficient to provide consultants to deliver staff development, or personnel to provide student support or instructional programs. Rather, the amount lends itself to be used to provide materials and equipment.* In contrast, decisions about services for public school students generally are made on a district-wide basis; the funds to provide services to public school students are generated by the entire enrollment of the district.

To illustrate the importance of the level of funding, we compared the services for public school students in those districts with no more than $7,500 available to provide services to these students, with the services provided for private school students in all the districts with private school student participation (see Table V-3). When the amount of funding available is comparable, the public and private school student activities are much more similar than when it is not (as in Table V-1).

The second factor constraining the range of services to private school students is that these students typically have critical needs (according to private school staff) in the areas of materials and equipment. Private schools often are run on tight budgets; materials and equipment, which can be purchased only after the basic supplies and textbooks have been acquired, were in short supply in many of the schools we visited. For example:

- A private school librarian said, "Without Chapter 2 we would be in bad shape. We don't have a library equipment budget." Chapter 2 and Title IV-B have provided much of the equipment in the school.
- A private school principal said, "If there were no Chapter 2, [our students would] have no AV, no supplemental materials. Our operating budget is barely enough to keep the books fairly current [there is a state program that provides textbooks]. There's no way [our students would] have anything but texts and paper without Chapter 2."

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*Some private schools have avoided this constraint by participating in consolidated service arrangements. This is most common for schools that belong to a private school organization (particularly the diocese). Consolidation also seems to occur most frequently in or around big cities, where the diocese has more influence and, often, the time and resources to provide services such as inservice or instructional programs.

Table V-3

COMPARISON OF CHAPTER 2 SERVICES TO PUBLIC AND PRIVATE SCHOOL STUDENTS AT COMPARABLE LEVELS OF FUNDING

	Percentage of districts in which each activity has been supported by Chapter 2 funds in the last 3 years for	
Type of Activity	Public school students (only in districts with no more than $7,500 available for public school Chapter 2 services)	Private school students in all districts serving private school students*
Computer applications	67	68
Other instructional materials and equipment	74	92
Curriculum or new program development	19	22
Student support services	11	9
Instructional services	13	6
Staff development	14	11

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* Districts with at least 600 students.

- Another private school principal said, "Without Chapter 2, [the students] would never be able to [have] large items...it would take many raffles...we could swing record players...big items like computers are not within our budget...we certainly couldn't have gotten them as quickly."

Even in states where the state government has a history of providing services to students in private schools, Chapter 2 may provide the only materials and equipment. For example, in one state with a large state program of aid to serve private school students (funded at over $200 per pupil), state funds are provided to support mainly personnel and texts. Thus, Chapter 2 (and Title IV-B previously) was a major source of materials and equipment for the benefit of students in private schools.

Third, the services for private school students are constrained by the tradition of their participation in the antecedent programs. Since private school students had participated mainly in Title IV-B, many private school personnel think that Chapter 2 is just an extension (or name change) of Title IV-B, even if the district has not specifically told them so. The tradition also seems to hold in districts in which the private school students participated in other antecedent programs; for example, we saw two districts in which Chapter 2 provided, for the benefit of students in private schools, staff (aides, guidance counselors) who previously had been supported under ESAA.

Assessment of Equitability

Because of these three factors, we conclude that most private school officials would request that Chapter 2 money be used to provide materials and equipment, regardless of any push in that direction from the districts. We saw many examples of private schools in which personnel clearly knew all the options available to their students under Chapter 2; even in these schools, materials and equipment were the primary services under Chapter 2. The materials and equipment typically were very basic items (e.g., encyclopedias, maps, globes, reference materials, basic equipment), although many students were provided with computer hardware and software. Private school personnel rarely had the luxury to even think of student needs beyond materials and equipment. Thus, although private school student services under Chapter 2 in practice are more restricted than the law or regulations imply, and although public school and private school student services are often different, we can conclude that the private school personnel generally believe that their students are receiving equitable services under Chapter 2--or at least what the personnel believe their students need.

Changes in Equitability with the Block Grant

Depending on what antecedent program one uses as a baseline, the equitability of services either has not changed much or has improved with the change to the block grant. For students in the majority of private schools (schools that had students who participated only in the Title IV-B program), there probably is not much change in the ability of Chapter 2 to meet their needs, even though decisions under Chapter 2 are sometimes more broadly based and sometimes non-library services are provided. On the other hand, private school personnel perceive that Chapter 2 meets the needs of the private school students much better than did some other antecedent programs, such as Title IV-C, Teacher Corps, and Teacher Centers. Under Title IV-C, for example, private school officials were sometimes asked to have their students participate in a project set up by the district. According to one diocesan government programs liaison, the attitude of the public schools often was, "Can you fit in?" to projects that sometimes did not meet any needs of the Catholic school students. The diocesan government programs liaison concluded that:

> Chapter 2 was a little bit of heaven...finally, they are asking what are the needs of the private school students...if we can document the needs, we get the [services] to meet them.

Summary

The analyses in this section support the following findings:

(1) The range of services made available to private school students under Chapter 2 is narrower, on the whole, than that for public school students. Districts less often use funds for computer applications, curriculum or new-program development, student support services, instructional programs, or staff development aimed at private school students than they do for public school students.

(2) District actions often restrict the range of options for services to private school students, sometimes overtly, sometimes subtly.

(3) Private school factors, however, seem to play a more central role in determining what private school students receive; these include:

(a) The small amount of Chapter 2 funds available for services to students in a given private school (due to the generally small size of these schools and the fact that, administratively, the services usually are provided on an individual school basis).

(b) The tight budgets of many private schools and the fact that the kinds of instructional materials and equipment that can be purchased under Chapter 2 often are in critically short supply.

(c) Private school officials' expectations for services, established under the antecedent programs.

(4) Private school officials tend to indicate that Chapter 2 is supporting the kinds of services they believe their students need; from their perspective, services under the block grant are generally seen as equitable.

(5) By comparison with antecedent programs, the equitability of services is either the same or somewhat improved (from the private school perspective), depending on which antecedent program one uses as a baseline.

VI ADMINISTRATIVE ISSUES

In this section, we discuss three issues surrounding the local administration of services for private school students under Chapter 2:

- How extensively do public school officials consult with private school officials regarding Chapter 2 services?
- How complex and burdensome is the administration of Chapter 2 services for private school students?
- How has the block grant affected the quality of relations between public school districts and private schools?

Consultation with Private School Officials

According to the Chapter 2 regulations, "an LEA receiving Chapter 2 funds shall consult with appropriate private school officials regarding the development and implementation of the Chapter 2 program before the LEA makes any decision that affects the opportunities of private school children to participate in the program." Several issues have arisen concerning consultation: (1) the degree to which the notification of private schools is broadly based, (2) the extent to which districts encourage private school student participation in Chapter 2, (3) the locus of decisionmaking about services for private school students (e.g., guidance or restrictions, subtle or not-so-subtle, from the district or others), and (4) the timing of private school consultation (e.g., whether it is early enough in the process to influence LEA decisions).

Most of these issues have been discussed in previous sections. In general, under Chapter 2, the administrative process does not really involve "consultation," in which the district discusses Chapter 2 services with private school officials and then decides about the services to be provided. More typically, the district informs the private school officials about the amount of Chapter 2 funds available to provide services to their students; the private school officials then complete an application (or the equivalent), which is submitted to the district to be incorporated into the district's application to the state.

In our site visits, we heard about very few problems with this process. As described earlier:

- In the districts we visited, all eligible private schools were notified about Chapter 2; however, we have no information about schools that are not on the eligibility lists but might be eligible. (See Section III.)
- The amount of district follow-up varies; however, a lack of outreach is not a major reason for private school student nonparticipation. (See Section III.)
- Although some districts may try to guide Chapter 2 services for private school students, private school personnel generally believe that their students are receiving the services they need under Chapter 2. (See Section V.)

We also heard of few problems with the timing of this "consultation" process. Typically, the private school officials are notified of the amount of Chapter 2 funds available to provide services to their students shortly after the district receives this information from the state. Private school personnel reported that they had an adequate amount of time to decide how the district should spend the money and to prepare their applications, particularly since the amount of money was about the same from year to year. In fact, it seems that Chapter 2 has eliminated the timing problems that were present under some antecedent grant programs, such as Title IV-C. A diocesan government programs liaison told us that, under Title IV-C, private school principals were often asked to sign off on a project "the day before it was submitted to the state." This problem probably related to the fact that private school student participation in these grant programs often involved their participating in a project developed by the district. Even when private school personnel were involved in the planning of IV-C projects, deadlines often were rushed because joint grant-writing was involved. For example, a private school principal described deadlines under IV-C: "They would call Friday for stuff Monday. I used to get hyper." Chapter 2, however, typically does not involve private school students participating in projects developed by districts or developed jointly by district and private school officials; therefore, this timing problem has been eliminated.

Complexity and Burden of Administration from the Public School Perspective

The major administrative responsibility for the private school student component of Chapter 2 falls to the public school districts (except in states with bypass or intermediate unit arrangements), rather than the private schools, because of the constitutional limitations on using public funds to serve private school students. The administration of Chapter 2 can be quite complex and can create various problems.

As Table VI-1 shows, approximately 40% of districts of at least 600 students (with eligible private schools*) consider administering the private school student component "somewhat" or "very" burdensome.** Overall, this administrative task is considered more burdensome than any other (preparing applications, planning, needs assessment, supervision, accounting, reporting, evaluation, and consultation with parents and other community members) under Chapter 2.

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* Ratings are nearly identical when all districts with eligible private schools are compared with districts that actually serve private school students.

** The mail survey item requested respondents to rate nine types of administrative tasks involved in Chapter 2, one of which was "interacting with private schools and administering programs for private school students," on a 4-point scale (not at all, not very, somewhat, very burdensome).

Table VI-1

BURDEN ASSOCIATED WITH ADMINISTERING CHAPTER 2 SERVICES FOR PRIVATE SCHOOL STUDENTS, BY SIZE OF DISTRICT

District Size (Enrollment Range)	Percentage of districts* indicating "somewhat" or "very" burdensome	Mean burden rating*,**
Very large (25,000 or more)	56	2.7
Urban	65	2.8
Suburban	50	2.5
Large (10,000 to 24,999)	47	2.4
Medium (2,500 to 9,999)	40	2.3
Small (600 to 2,499)	36	2.2
All districts (600 or more)	40	2.3

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[*] Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

[**] Based on a 4-point burden scale: 1 = not at all; 2 = not very; 3 = somewhat; 4 = very. Midpoint on burden scale = 2.5.

Not surprisingly, larger districts considered the private school student component to be more burdensome than smaller districts. This difference is mainly due to the greater number of eligible private schools in larger districts, as well as the greater number of private schools that have elected to have their students participate in Chapter 2. In fact, in the very large urban districts (enrollment of 25,000 or more), private school student involvement is considered to be the most burdensome aspect of Chapter 2 by far. Two-thirds (65%) of these districts describe the administration of the private school student component as "somewhat" or "very" burdensome; every other administrative task is rated "somewhat" or "very" burdensome by 50% or fewer of these districts.

Many specific activities that could create these reports of burden are involved in the administration of the private school student component of Chapter 2. Although no problems with this component were reported in a majority of districts, certain aspects of administering private school student services seemed to cause some difficulties (see Table VI-2):

- Notifying and consulting with private school officials about Chapter 2 (in 24% of districts).
- Paperwork generated by the involvement of private school students (in 22% of districts), especially in very large urban districts.
- Monitoring use of Chapter 2 materials or services that benefit private school students (in 17% of districts).
- Unreimbursed administrative costs of providing materials or services to private school students (in 12% of districts).

Other kinds of problems in the administration of services for private school students were less prevalent (occurring in less than 10% of districts), such as forming relationships with private school officials with no experience in antecedent programs (in general, it seems that the increase in the number of schools that have elected to have their students participate for any individual district is not very large) or providing services to private school students different from those provided to public school students (in general, private school students are provided materials

Table VI-2

PROBLEMS DISTRICTS ENCOUNTER ADMINISTERING SERVICES FOR PRIVATE SCHOOL STUDENTS, BY SIZE OF DISTRICT

	Percentage of Districts Encountering Problems With Respect to...				
District Size (Enrollment Range)	Notification/ consultation*	Paperwork*	Monitoring**	Unreimbursed administrative costs**	Percentage of districts encountering no problems with the private school student component*
Very large (25,000 or more)	33	48	29	22	30
Urban	35	58	27	22	20
Suburban	32	38	31	24	43
Large (10,000 to 24,999)	39	38	30	25	36
Medium (2,500 to 9,999)	25	24	14	16	57
Small (600 to 2,499)	20	16	16	3	65
All districts (600 or more)	24	22	17	12	57

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[*] Among districts with eligible private schools, and in which the private school student component is administered at the district level.

[**] Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

and equipment, presenting few difficulties for districts). We heard of other problems during our site visits, although we do not have data on their frequencies. For example, some districts could not submit their Chapter 2 applications until all the private school applications (and waiver letters, if required) were received; this requirement held up the Chapter 2 application in some districts.

Factors Related to Perceived Complexity and Burden

One might expect that more districts would report problems with the private school student component of Chapter 2. In our site visits, we found that, particularly in districts with a large number of private schools, the administration of the private school student component may be a big job and take a lot of time. For example, in one very large city with 29 eligible private schools, 25 of which have elected to have their students participate in Chapter 2, district personnel noted that it takes "incredible clerical time" to notify all the schools, collect all the applications and waiver letters, give technical assistance (e.g., help with filling out the application form, give advice about the appropriate computers to be provided), process the purchase orders, etc. However, the percentage of districts reporting problems in the mail survey is probably as low as it is because district personnel often consider these administrative activities to be part of their jobs; for example:

- The Chapter 2 coordinator in the district described above said that, even though a lot of time was involved in administering services for private school students, she does not mind it; "I see its purpose and I enjoy the people."
- In a very large urban district with 44 eligible private schools (40 of which have students participating in Chapter 2), the Chapter 2 coordinator said that the private school student component "is just part of our jobs in the federal programs office."

The administrative burden and complexity associated with Chapter 2 can also be lessened under various conditions. For example, less burden was reported when the Chapter 2 coordinator had fewer other responsibilities.

Less burden was also reported by districts with a history of private school student participation in state and federal programs. In these districts, operating procedures to deal with private school officials are well established, and often personal relationships between the public and private school sectors have been built up. Also, the administration of the private school student component of Chapter 2 is sometimes very simple in comparison with other, much larger state or federal programs.

Private school organizations have sometimes helped alleviate the paperwork associated with the participation of private school students in Chapter 2. We saw examples of dioceses collecting all the Catholic school applications, submitting one consolidated application for all the schools in the diocese, or appointing a person to serve as the private school contact person for the district. Although in these cases the Chapter 2 coordinator may also deal directly with the individual private school principals regarding purchase orders, etc., these procedures may ease the district's paperwork significantly, particularly in districts with large numbers of Catholic schools.

Finally, complexity and burden are less in smaller districts, where there generally are few private schools and little Chapter 2 money to administer. For example, one district we visited serves students from two private schools, both located within 2 miles of the district office, and makes available $1,200 annually to provide Chapter 2 services to students in these schools. The Chapter 2 coordinator in this district described the private school student component as consisting of only a few written and phone contacts each year.

Changes with the Block Grant

District personnel in most districts we visited did not feel that the block grant brought about a big change in the administrative complexity and burden associated with the private school student component of federal programs. As pointed out earlier, administration of the private school student component of Chapter 2 generally differs very little from the procedures established under antecedent programs, particularly Title IV-B. Operating procedures have become routinized, and often personal relationships have become established. The fact that some districts have to deal with more private schools under Chapter 2 than before can create an increased burden; these typically are schools that may be unfamiliar with the workings of federal programs and that do not belong to an organization active in Chapter 2. However, the increase in the number of private schools with participating students generally is not very large for any single district and probably creates little added administrative burden.

We did hear reports of decreased burden where private school students had participated in antecedent programs other than Title IV-B. For example, in one very large city, the private school student component is considered to be easier than it was under the Title IV-C program, in which the district had to hold separate meetings with private school representatives for each IV-C grant application; only one meeting is necessary under Chapter 2.

Private School Perspective on the Complexity and Burden of Chapter 2

Overall, the private school principals and staff with whom we spoke said that their role in Chapter 2 was very easy:

- One Catholic school principal remarked, "It is a pleasant, easy program."
- A Catholic school librarian feared that Chapter 2 would be a lot of work; she was relieved that "the paperwork is so simple."

However, we did see examples of minor problems. For example, we heard about private schools that had had delays in receiving materials or equipment.* In addition, some private school principals expressed dismay at the size of the administrative reimbursement taken by the district, especially if they were aware of the original amount of funds available to provide services to their students (before the administrative costs were taken out). However, overall, we saw very little evidence of burden experienced by the private school officials.

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* We also heard similar complaints from public school personnel.

The Quality of the Relationship Between Districts and the Private Schools

Given the possibility of increased participation by private school students, the fact that a larger proportion of districts' allocations might go to services for these students, and the associated administrative responsibilities, there was a possibility that the coming of the block grant would create significant tensions and disharmony between districts and the private schools. Our analyses suggest that these tensions are not widespread but are present in certain kinds of circumstances.

Relations between the school districts and private schools were relatively harmonious, or at least civil, regarding Chapter 2 matters in most places we visited. A quote from a private school principal in a suburban district is typical of the comments we heard:

> [The Chapter 2 coordinator] has helped us to understand how much we can do under Chapter 2. Our relationship with the district is very good. I can pick up the phone and ask for help or suggestions. We get a lot of help from the secretary, too. There's a feeling of professionalism. I think the district makes an effort because we are a private school. They make sure we get our fair share.

Five factors appear to contribute to this state of affairs:

- State context.
- A strong religious base in the community.
- Interpenetration of the public and private education systems.
- District leadership.
- Personalities of district Chapter 2 staff and private school officials.

Various aspects of the state context can encourage harmonious relations. For example, in states with a history of state programs serving private school students, good relationships often have been established between personnel at the districts and private school personnel. The provision of services to private school students is just part of districts' standard operating procedures. In addition, Chapter 2 may be small in comparison with the state programs, decreasing the perception of Chapter 2's burden.

A strong religious base in the community can also promote harmony. In communities with strong religious affiliations, there tends to be more support for serving private school students with public funds. For example, in one district we visited, approximately 50% of the community is Catholic, and about 22% of the students attend parochial schools. The district is dependent on the Catholic population's support to pass its levies. Further, most public school officials either went to one of the Catholic schools in the community or know someone who did. These factors have led to excellent relations between the public and private school sectors.

Interpenetration of the public and private education systems is also a factor in smooth relations between public and private schools. When district administrators have held jobs in both the public and private systems, or when the private schools serve as a feeder system for the public schools, services seem to be provided quite smoothly to private school students. This seems to be a particularly prevalent pattern in smaller districts. For example:

- In one rural district comprising several small communities, three of the six Catholic school principals had been administrators or teachers in the public schools. An assistant superintendent (himself a Catholic and educated in private schools) told us, "The private schools are trying to educate kids. Why be adversarial? Those kids may end up ours. Their teachers often were ours, or went through our schools. The population is so small in each of our communities. Everyone knows everyone else."

- In a small town in which the one private school serves grades K-6, the Chapter 2 coordinator commented that it was to the district's advantage to provide private school students with equivalent kinds of services: "If we don't keep these kids up to district standards, it will come back to haunt us when we get them at the secondary level. If it [the private school] was a K-12 school, it would be a little different...[there would be] competition."

District leadership can also encourage harmonious relations. In some districts, district personnel (e.g., superintendent, Chapter 2 coordinator) believe strongly in serving private school students; administrators told us that "we're all walking on the same road," trying to educate our children. This feeling sometimes is accentuated in smaller districts, where everyone knows everybody else in the community, and "they're all our children."

Personalities of district Chapter 2 staff and private school officials are also important. For example, according to a diocesan government programs liaison, a major determinant of public/private school relations in a district is the personality and philosophy of the individuals involved in the district's administration of Chapter 2; this includes both the Chapter 2 coordinator and (perhaps more importantly) the coordinator's secretary.

District size by itself does not seem to make a difference. We saw many examples of harmonious relationships in very small, as well as very large, districts.

In our site visits, we identified six factors that undermined the relationship between the district and the private schools:

- Large perceived or real "losses" of money (from the antecedent programs) that must be used to provide services to private school students under the block grant.
- The fact that services are sometimes provided to private school students with funds that were not generated by these students.
- Inequitable expenditures or services for private school students.
- District turnover or incompetence.

- Excessive complexity in the district's administrative task.
- Philosophical opposition to serving private school students.

Large perceived or real "losses" of money that must be used to provide services to private school students under the block grant can create problems. In particular, in cities that lost a considerable amount of money with the block grant through the loss of ESAA funding, district personnel sometimes view the public and private school sectors as being in competition for services from a limited amount of money.

Providing services to private school students with funds that were not generated by those students can also contribute to discord. Desegregation-related funds, such as money derived from a state formula weighting factor for desegregation or special money to former ESAA districts to compensate for the loss of ESAA, are the clearest examples of this. As one district superintendent explained, "Our big frustration is sharing with the private school [students]. We were particularly bent out of shape because they qualified for the bonus money for desegregation. We did a lot, then we had to [serve them with] half the money."

Inequitable expenditures or services for private school students can also create problems. These inequities can take the form of unequal per pupil expenditures or extreme district rigidity about the use of Chapter 2 funds. For example, in one district we visited, the district is only providing the private school staff with inservice training under Chapter 2; because of these restrictions, the archdiocese is currently suing the district.

District turnover or incompetence can also undermine harmony. In one very large city district we visited, extensive change in district personnel had frustrated private school personnel, who told us "you can't mail your things because everything gets lost, so you have to hand-deliver it. If you call, no one knows who to talk to. The [district] person who sent out the memo doesn't know what's in it or has left the district. The district is in a total state of disorganization." The fact that private school questions often go unanswered in such districts creates distrust and inefficiency in the relationship.

In some very large districts, the complexity of administering services for private school students (e.g., the amount of paperwork) can have a deleterious effect on public/private school harmony, as implied by an earlier discussion of administrative burdens.

Finally, philosophical opposition to serving private school students has predictable effects on the relations between the district and private schools. This can occur where district administrators object to using federal funds to serve private school students, particularly if they perceive (correctly or incorrectly) that the private school students are rich and do not need federal help.

Summary

In this section, our analyses lead to the following general findings:

(1) District personnel typically consult with private school officials by informing them of the amount of funds available for services in each private school and soliciting their preferences for purchases, via either a formal application or other written request.

(2) There is evidence (from this and previous sections) that the consultation process proceeds smoothly and satisfactorily, on the whole:

  (a) Typically all eligible private schools are notified.

  (b) Lack of outreach by districts is not a major factor in nonparticipation.

   (c) District restrictions on the range of services do not appear to prohibit the purchase of services that private school officials believe their students need.

   (d) Private school officials typically learn about the availability of funding in adequate time for them to express their preferences for the use of these funds.

(3) The administration of Chapter 2 services for private school students falls to the public school district and can be complex, depending on the numbers of private schools and the amount of funds to administer.

(4) In districts with a relatively complex job of administration, the following tasks are most frequently mentioned as burdens or problems:

   (a) Notification and consultation (in approximately a quarter of all districts with eligible private schools).

   (b) Paperwork (in roughly the same percentage of districts, especially in very large urban districts).

   (c) Monitoring (in 17% of all districts serving private school students).

   (d) Unreimbursed administrative costs (in 12% of all districts serving private school students).

(5) Not all districts facing complex administrative arrangements for serving private school students experience them as burdens. The administrative activities associated with the private school student component typically are considered to be an accepted part of the job of administering Chapter 2. In addition, the following

factors appear to lessen burden: routinized arrangements established under antecedent programs or other state or federal programs, lack of other responsibilities for district staff, and helpful private school organizations (e.g., Catholic diocesan offices that help coordinate notification or applications).

(6) District administrative burdens seem not to have changed significantly, except in districts where private school students participated in antecedent programs other than Title IV-B.

(7) Private school officials have little role in the administration of Chapter 2 services for their students and generally find that the program proceeds smoothly.

(8) Under the block grant, the relationships between school districts and private schools are harmonious, or at least civil, especially where:

   (a) State context encourages services to private school students.

   (b) There is a strong religious base in the community.

   (c) Public and private school systems are informally linked (e.g., where elementary private schools feed students into public secondary schools).

   (d) District leadership, private school officials, and other relevant staff believe in cooperation between the public and private schools.

These conditions occur in districts of all sizes.

(9) Disharmony is especially likely where:

(a) There have been large perceived or real reductions in district funding with the shift to Chapter 2.

(b) Funds generated by the characteristics of public school students or activities (e.g., related to desegregation) are used for private school student services.

(c) Expenditures or services are inequitable.

(d) District staff have turned over rapidly.

(e) The district's administrative task is excessively complex.

(f) District personnel philosophically oppose serving private school students.

VII CONCLUSION

In conclusion, we first summarize our findings concerning the equitable participation and administrative issues. We then consider the costs and benefits of the private school student component of Chapter 2, as well as the changes brought about with the block grant, from both the public and private perspectives. Finally, we put the costs and benefits in perspective.

Issues of Equitable Participation

From our data, we conclude that, overall, the participation of private school students in Chapter 2 is equitable, as intended by law, although there are some exceptions. More specifically:

- In the districts we visited, virtually all private schools that have been identified as eligible to have their students participate in Chapter 2 and that want them to participate have access to the services supported by the block grant. Those electing not to have their students participate usually do so because of philosophical objections and the small amount of money available to provide Chapter 2 services, not because they are denied the opportunity. However, we have no information about the accuracy of the lists of eligible schools; there may be some schools not on the lists that are eligible and might desire that their students participate in Chapter 2.

- Generally, Chapter 2 funds are expended to serve public and private school students on an equal per pupil basis, although certain adjustments may affect this distribution. The SEA plays an important role in the determination of these expenditures and can be a major force in making per pupil expenditures equal. Personnel in some districts, particularly those that had participated in ESAA, are upset about this provision of Chapter 2; however, in general, it has been accepted philosophically and the law has been followed.

- Private school students have available to them a narrower range of activities under Chapter 2 than do public school students. However, despite evidence that some districts may be restricting the range of activities for private school students, most private school personnel feel that their students are receiving the services they need under Chapter 2, particularly given the amount of funding available for these services.

Particularly in the areas of access and services, private school students are served more equitably under Chapter 2 than under the antecedent programs. A diocesan representative summarized the situation: "Even if the district or the state is philosophically opposed, they must share equitably; Chapter 2 has the same language as IV-B and IV-C, but Reagan put teeth into the words ... before, it was perfunctory."

Certain factors encourage equitable participation, including:

- An active state education agency. In states that specify the details of notification, expenditures, and services, arrangements for serving private school students tend to be more consistently equitable.
- Strong private school organizations. State-level private school organizations have had influence on the states' Chapter 2 allocation formulas, as well as the uses of the states' set-aside share of Chapter 2. At the local level, these organizations can inform individual private schools of the block grant and their students' rights and assist private school officials in dealing with districts. We saw mainly Catholic organizations performing these roles; the Catholic schools are typically the most highly organized, represent the largest number of private schools, and have a long history of student participation in federal programs. However, we also saw examples of other active groups.
- A long history of private school student participation in state and federal programs. Where there is a long-standing relationship, equitable participation is more likely.

Equitable participation can be strained in certain circumstances, such as in districts that have lost considerable money with the block grant; however, it seems that Chapter 2's regulations generally are followed, and equitable participation generally is achieved.

Administrative Issues

Our data show the following regarding the administrative issues raised under Chapter 2:

- "Consultation" under Chapter 2 usually consists of informing private school officials how much funding is available for services to their students and asking these officials for an application (or equivalent form of request). There are few problems associated with this consultation process.
- District personnel often perceive the administration of Chapter 2 services for private school students as relatively burdensome, particularly those in very large districts with many private schools. However, the administrative activities associated with the private school student component typically are considered to be an accepted part of the job of administering Chapter 2.
- From the perspective of private school officials, there is little complexity or burden associated with Chapter 2.
- Relations between the school districts and private school officials are relatively harmonious, or at least civil, regarding Chapter 2 matters, especially where the state context is favorable toward services to private school students, the community has a strong religious base, public and private school systems are informally linked, and where district leadership and private school officials want smooth relations.

Overall, the administration of the private school student component of Chapter 2 (from both the public and private school perspectives) is similar to that under Title IV-B. However, the perceived burden may have decreased in those districts in which there had been private school student participation in other antecedent programs, such as Title IV-C.

Costs and Benefits from the Public School District Perspective

Overall, personnel in districts perceive two major costs associated with the private school student component of Chapter 2:

- Administrative Burdens. The paperwork involved in administering Chapter 2 services for private school students can generate significant burdens for district personnel, particularly in very large districts with many private schools. In addition, districts sometimes face problems in notification and consultation, as well as monitoring. These administrative problems have not changed significantly with the block grant; although many districts have to deal with increased private school student participation, the increase seems to be relatively small for any single district, creating few additional problems. In fact, in many districts, operating procedures established under Title IV-B have been carried over for Chapter 2, and the administration (although taking considerable time) proceeds quite smoothly and is considered part of the job. For those districts in which the private school students participated in antecedent programs in addition to Title IV-B, administration under Chapter 2 may actually be easier, since districts have to deal with the private schools concerning only one funding source.

- Administrative and Other Costs. A number of districts face problems with unreimbursed administrative costs. In addition, particularly in districts that had participated in the ESAA program, there was some concern about the large reductions in funding that accompanied the block grant and the need at the same time to make a greater proportion of their decreased allocations available for services to private school students. Although we saw a few exceptions, most districts seemed to accept this situation philosophically, because "it's the law."

Districts saw few benefits to themselves associated with the private school student component of Chapter 2; these benefits were also present under the antecedent programs. Some respondents mentioned that federal funding of services for private school students helps improve relations with the community, particularly in communities where a large number of students attend private schools. In addition, in districts where the private schools serve, in effect, as a feeder system for the public schools, district personnel see it as being to their advantage to provide services for private school students.

It was difficult for district personnel to weigh the costs of the private school student component of Chapter 2 against the benefits. Private school student participation in federal programs had been standard operating practice under Title IV-B (as well as some other antecedent programs), and

Chapter 2 brought about few changes (other than fiscal). District personnel generally accept the private school student component of Chapter 2 as part of their jobs and as part of the requirements for accepting federal money.

Costs and Benefits from the Private School Perspective

Individuals we interviewed in the private school sector saw many more changes with the block grant, mostly positive. These changes were more often enumerated by individuals in private school organizations (e.g., the dioceses), rather than private school principals, perhaps because the former have a broader perspective. Positive changes resulting from the block grant include:

. More Money. Under Chapter 2, substantially more money is available to provide services to private school students than was available under the antecedent programs. According to a diocesan representative, "there's no comparison in the amount of money [available to provide services] under Chapter 2, compared to IV-B and a few crumbs under IV-C." This increase has enabled private school students to benefit from more materials and equipment, as well as more expensive equipment, such as computers.

. More Flexibility. Some private school personnel see Chapter 2 as more flexible than the antecedent programs, such as Titles IV-B and IV-C, and as having greater potential to meet the needs of private school students. This increased flexibility under Chapter 2 (along with the availability of more funds to provide services) has brought some new participants to federal programs. However, although private school officials like the flexibility, they have generally used Chapter 2 to continue the Title IV-B program, that is, to provide materials and equipment for their students. They have not exercised the full range of options available to them under Chapter 2, although there might be changes in the future; as one private school librarian said, "I think we're realizing only now the openness of Chapter 2."

. More Equitability in Access and Services. Because of the greater amount of money available to provide services, greater flexibility, and greater district outreach, private school personnel find it easier for their students to participate, as well as easier to meet their students' needs, in Chapter 2 than in the antecedent programs. Although the requirements for equitable participation of private school students in Chapter 2 are similar to those under the antecedent programs, particularly Title IV-B, some respondents felt that the requirements have been emphasized more under Chapter 2.

- Slightly Less Burden. Many private school respondents felt that their responsibilities under Chapter 2 were similar to those under the antecedent programs, or else may have decreased slightly with the block grant, particularly for private schools whose students had previously participated in antecedent programs other than Title IV-B.

- More Dependable Funds Available for Private School Student Services. Some private school personnel who had participated in Title IV-C appreciated the fact that the availability of services from the Chapter 2 money was "a sure thing," unlike competitive grant funds. Although there was the potential for more money to be available for services under IV-C, private school students could not receive services unless the district participated in the program; in addition, even if the district applied, the services were not guaranteed.

Private school personnel also saw many benefits of the antecedent programs that were carried over into Chapter 2. Primarily, private school personnel felt that Title IV-B had met critical student needs and that Chapter 2 is continuing to do so (with more funding available, resulting in more services).

Private school personnel mentioned few costs involved with Chapter 2. Most of the problems were seen as minor annoyances, particularly in comparison with the benefits. However, private school personnel may have been reluctant to tell us about their problems, because they generally feel that the services are so desperately needed. The attitude of many school-level personnel appears to be that it is nice to get what they can. Sometimes private school organizations have more complaints, but even those seemed to be relatively minor, with a few exceptions.

Overall, most private school officials we interviewed felt that there was no question that the benefits of Chapter 2 participation outweigh the costs. One private school principal told us, "Chapter 2 has helped [my students] a great deal. It's the best the federal government has done since I've been in education." A diocesan representative summarized the opinions of many by telling us that, because of the amount of money available and the increased flexibility, Chapter 2 is "a beautiful, beautiful concept."

Putting Costs and Benefits in Perspective

There is an asymmetry about the way costs and benefits associated with Chapter 2 services for private school students are distributed. Where there are significant costs, they are borne almost entirely by the public school districts. The benefits accrue almost entirely to private school students. The block grant signals a small shift in the distribution of costs and benefits from federal funding--that is, benefits that formerly were concentrated more heavily on the needs of public school students are now shared more extensively with private school students, yet the costs remain (or have increased) for public school officials.

This shift takes place in a changing climate of opinion and policy direction regarding federal aid for private school students, which may be further affected by the recent U.S. Supreme Court decision banning Chapter 1 services by public school personnel on private school premises. Forces tug and pull at federal policy in both directions, on the one hand urging increased parent choice and access to private education, on the other hand reaffirming the limitations on publicly funded services for those who are educated in private institutions.

The very success of the block grant in achieving equitable participation for private school students may thus sharpen the dilemmas of federal aid to these students. Given current constitutional limits (as interpreted by government and the courts) on the use of public funds for this purpose, public school district personnel are left with the awkward job of administering services that take place on the premises of another institution. To do that job too conscientiously--e.g., with thorough monitoring and evaluation of services--risks greater entanglement of church and state. Inattention to administration, on the other hand, risks abuse. The more that private school students participate in activities supported by the block grant, the more acute these dilemmas will become.

Conceivably, greater use of bypass arrangements or more attention to the full reimbursement of districts' administrative costs would ease the situation. But such measures would not remove all the root causes of concern. Congress and the agencies of government are left with a policy puzzle, which may have no acceptable solution. They must listen carefully both to those who stand to gain and those who carry the weight of implementation.

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Appendix A

TECHNICAL NOTES AND STANDARD ERROR VALUES FOR TABLES

Appendix A

TECHNICAL NOTES AND STANDARD ERROR VALUES FOR TABLES

This appendix contains technical notes and tables replicating those in text, including row or column n's and standard error values for means or proportions.

Technical Notes

1. (Note on Table II-3) The median number of private school students participating in Chapter 2 was calculated using the following procedure. For those districts indicating that the per pupil expenditures for services to public and private school students under Chapter 2 currently were equal, the following equality was set up (based on the assumption that 1983-1984 per pupil expenditures were also equal):

$$\frac{\text{Expenditures for public school students (1983-1984)}}{\text{Public school enrollment (1983-1984)}} = \frac{\text{Expenditures for private school students (1983-1984)}}{\text{Participating private school enrollment (1983-1984)}}$$

For each district, data were available (from the mail questionnaire or other sources) on all the variables except participating private school enrollment; this latter variable was then solved for.

2. The tables in text and in this appendix are all based on population (or subpopulation) n's, estimated by multiplying raw n's within each cell of the survey stratification grid by the inverse of the sampling fraction (recalculated to reflect nonresponse) and by the inverse of the item matrix sampling fraction. Thus, all percentages, means, and medians in the tables are national estimates. For further detail on sampling and weighting procedures, see the methodological appendix to the main report of the study (Knapp and Blakely, 1986).

Standard Error Values for Tables

Confidence intervals around estimated population means and proportions can be calculated by:

$$+/- 1.96 (Se_x) [p < .05]$$

The significance of differences of non-overlapping samples can be determined from the normally distributed statistic:

$$(M_1' - M_2') / (Se_1^2 + Se_2^2)^{1/2}$$

where M_1 and M_2 are means (or proportions) and where Se_1 and Se_2 are standard errors of the two samples.

Table A-II-1

DISTRICTS WITH PRIVATE SCHOOLS THAT HAVE STUDENTS ELIGIBLE TO PARTICIPATE IN ACTIVITIES SUPPORTED BY CHAPTER 2, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n/n)[++] (Enrollment Range)	Percentage of districts in the 1984-85 school year that ... Have eligible private schools	Administer the private school student services*
Very large (25,000 or more) (n = 161/154)	100 (0)	96 (2)
Urban (n = 84/82)	100 (0)	94 (3)
Suburban (n = 77/72)	100 (0)	100 (0)
Large (10,000 to 24,999) (n = 478/478)	96 (1)	87 (2)
Medium (2,500 to 9,999) (n = 2,977/2,836)	74 (2)	61 (3)
Small (600 to 2,499) (n = 5,136/4,872)	46 (4)	39 (4)
Very small (under 600) (n = 6,099/--)	16 (4)	--**
All districts (n = 14,851/8,340)	42 (2)	51[+] (3)

---

[*] Excluding districts where the private school student component is handled by a bypass contractor or an intermediate unit. This is the case in 12% of the districts nationwide that have eligible private schools.

[**] Too small a sample size for national estimates (see text).

[+] Excluding very small districts.

[++] First value corresponds to column 1; second value corresponds to column 2.

Table A-II-2

DISTRICTS SERVING PRIVATE SCHOOL STUDENTS IN ACTIVITIES SUPPORTED BY CHAPTER 2, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n/n) (Enrollment Range)	Percentage of districts serving private school students in the 1984-85 school year among... Districts with eligible private schools*	All districts nationwide
Very large (25,000 or more) (n = 137/153)	95 (2)	87 (3)
Urban (n = 69/83)	98 (2)	90 (4)
Suburban (n = 68/70)	92 (4)	89 (4)
Large (10,000 to 24,000) (n = 406/465)	86 (4)	75 (4)
Medium (2,500 to 9,999) (n = 1,633/2,827)	79 (3)	47 (3)
Small (600 to 2,499) (n = 1,828/4,885)	67 (7)	26 (4)
All districts (600 or more) (n = 4,004/8,330)	75 (4)	37 (2)

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*In which private school student component is administered at the district level.

Table A-II-3

AVERAGE NUMBER OF PRIVATE SCHOOLS AND PRIVATE SCHOOL STUDENTS ELIGIBLE FOR, AND PARTICIPATING IN, CHAPTER 2, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n/n/n) (Enrollment Range)	Median number of private schools per district ... Eligible for Chapter 2-supported activities in 1984-85*	Median number of private schools per district ... With students participating in Chapter 2-supported activities in 1984-85**	Median number of private school students per district participating in Chapter 2 in 1983-84**,+
Very large (25,000 or more) (n = 128/133/107)	19	12	3,143
Urban (n = 64/69/57)	29	17	4,164
Suburban (n = 64/64/50)	15	7	2,596
Large (10,000 to 24,999) (n = 388/350/270)	5	4	1,097
Medium (2,500 to 9,999) (n = 1,550/1,334/957)	2	2	338
Small (600 to 2,499) (n = 1,842/1,230/870)	1	1	199
All districts (600 or more) (n = 3,908/3,047/2,204)	2	2	350

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[*] Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

[**] Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

[+] Because of the constraints of the data gathered, this number could be estimated only for those districts (94%) reporting that they spent an equal amount for services to public and private school students under Chapter 2.

Table A-II-4

AVERAGE AMOUNT OF CHAPTER 2 FUNDS (AND PROPORTION OF DISTRICT'S CHAPTER 2 ALLOCATION) AVAILABLE FOR SERVICES TO PRIVATE SCHOOL STUDENTS IN THE 1984-85 SCHOOL YEAR, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n/n/n) (Enrollment Range)	Median amount available from district's allocation*	Mean percentage of district's Chapter 2 allocation*	Median amount of Chapter 2 funds available per private school*
Very large (25,000 or more) (n = 129/129/124)	$28,908	9 (**)	$2,224
Urban (n = 69/69/66)	42,851	11 (1)	2,289
Suburban (n = 60/60/58)	18,312	7 (1)	2,041
Large (10,000 to 24,999) (n = 339/339/336)	7,500	8 (1)	1,948
Medium (2,500 to 9,999) (n = 1,222/1,222/1,222)	2,801	11 (1)	1,442
Small (600 to 2,499) (n = 1,146/1,146/1,146)	1,423	19 (3)	879
All districts (600 or more) (n = 2,836/2,836/2,828)	2,576	14 (2)	1,272

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[*] Among districts having one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

[**] Between 0.0% and 0.5%

Table A-II-5

CHAPTER 2 SERVICES TO PRIVATE SCHOOL STUDENTS BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n) (Enrollment Range)	Percentage of districts* in which each activity has been supported by Chapter 2 funds in the last 3 years for private school students:					
	Computer applications	Other instructional materials and equipment	Curriculum or new program development	Student support services	Instructional services	Staff development
Very large (25,000 or more) (n = 136)	84 (3)	100 (0)	22 (4)	16 (3)	6 (2)	30 (3)
Urban (n = 71)	85 (5)	100 (0)	23 (5)	15 (4)	5 (3)	39 (5)
Suburban (n = 65)	80 (6)	100 (0)	17 (4)	20 (5)	9 (5)	11 (3)
Large (10,000 to 24,999) (n = 336)	83 (4)	95 (2)	21 (4)	12 (4)	10 (3)	16 (4)
Medium (2,500 to 9,999) (n = 1,324)	64 (4)	91 (3)	20 (4)	9 (3)	7 (2)	14 (3)
Small (600 to 2,499) (n = 1,197)	66 (8)	91 (4)	24 (10)	6 (7)	4 (3)	6 (3)
All districts (600 or more) (n = 2,993)	68 (5)	92 (2)	22 (5)	9 (4)	6 (2)	11 (2)

---

*Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

Table A-II-6

DISTRICT MONITORING OF CHAPTER 2-SUPPORTED SERVICES FOR STUDENTS IN PRIVATE SCHOOLS, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n) (Enrollment Range)	Percentage of districts* that...						
	Require private schools to sign assurances of non-discrimination	Check nonprofit status of private schools	Check Chapter 2 services for secular nature/use**	Check that Chapter 2 services benefit students, not schools	Check that Chapter 2 services are supplementing, not supplanting	Check that services conform to Chapter 2 guidelines	Do not monitor Chapter 2-supported services for students in private schools
Very large (25,000 or more) (n = 131)	62 (4)	48 (4)	61 (4)	59 (4)	56 (5)	89 (3)	2 (1)
Urban (n = 66)	55 (6)	46 (5)	72 (5)	73 (6)	60 (6)	95 (3)	0 (0)
Suburban (n = 65)	75 (4)	53 (7)	53 (7)	42 (7)	50 (7)	86 (4)	3 (2)
Large (10,000 to 24,999) (n = 328)	31 (4)	21 (4)	58 (5)	55 (5)	38 (5)	85 (4)	2 (2)
Medium (2,500 to 9,999) (n = 1,285/1,266)+	26 (4)	15 (3)	36 (4)	39 (4)	42 (4)	82 (3)	5 (2)
Small (600 to 2,499) (n = 1,149)	14 (8)	8 (7)	42 (10)	40 (11)	33 (10)	74 (5)	7 (4)
All districts (600 or more) (n = 2,893/2,874)+	24 (4)	15 (4)	42 (6)	42 (6)	39 (6)	79 (3)	5 (2)

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* Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

** Only among districts having one or more private religious schools that have students participating in Chapter 2.

+ Second value corresponds to column 3 only.

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Table A-III-1

CHANGE IN NUMBERS OF PRIVATE SCHOOLS WITH STUDENTS PARTICIPATING IN ANTECEDENT PROGRAMS COMPARED WITH CHAPTER 2, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n) (Enrollment Range)	Percentage of districts* in which the number of private schools with students participating in Chapter 2 during the 1984-85 school year (compared with the antecedents) is...		
	Greater	The same	Less
Very large (25,000 or more) (n = 125)	48 (4)	43 (4)	9 (3)
Urban (n = 63)	59 (5)	38 (5)	3 (2)
Suburban (n = 62)	37 (5)	48 (6)	15 (5)
Large (10,000 to 24,999) (n = 378)	27 (5)	68 (5)	5 (2)
Medium (2,500 to 9,999) (n = 1,563)	18 (3)	79 (3)	3 (1)
Small (600 to 2,499) (n = 1,827)	13 (5)	87 (5)	0 (0)
All districts (600 or more) (n = 3,893)	18 (3)	80 (3)	2 (**)

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[*] Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

[**] Between 0% and .5%.

134

Table A-IV-1

PER PUPIL EXPENDITURES FOR SERVICES TO PUBLIC AND PRIVATE SCHOOL STUDENTS UNDER CHAPTER 2, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

	Percentage of districts* in which the per pupil expenditures for services to public and private school students in the 1984-85 school year are ...		
District Size (n) (Enrollment Range)	Equal	Greater for public school students	Greater for private school students
Very large (25,000 or more) (n = 133)	88 (3)	8 (2)	4 (2)
Urban (n = 68)	87 (5)	11 (4)	2 (3)
Suburban (n = 65)	89 (3)	6 (2)	6 (2)
Large (10,000 to 24,999) (n = 329)	92 (3)	4 (2)	4 (2)
Medium (2,500 to 9,999) (n = 1,206)	92 (3)	6 (2)	2 (1)
Small (600 to 2,499) (n = 972)	99 (1)	1 (1)	0 (0)
All districts (600 or more) (n = 2,640)	94 (1)	4 (1)	1 (**)

---

*In districts having one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

**Between 0% and .5%.

Table A-IV-2

DISPOSITION OF FUNDS FOR SERVICES TO PRIVATE SCHOOL STUDENTS THAT DO NOT PARTICIPATE IN CHAPTER 2, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

	Percentage of districts* in which funds that would have been used to serve private school students are...			
District Size (n) (Enrollment Range)	Expended for services to participating private school students only	Expended for services to public school students only	Expended for services to both public and participating private school students	Other**
Very large (25,000 or more) (n = 99)	9 (3)	22 (4)	67 (5)	2 (2)
Urban (n = 50)	9 (6)	27 (4)	64 (7)	0 (0)
Suburban (n = 49)	6 (4)	16 (6)	75 (7)	3 (3)
Large (10,000 to 24,999) (n = 195)	2 (1)	23 (7)	72 (7)	3 (3)
Medium (2,500 to 9,999) (n = 605)	2 (5)	19 (4)	70 (7)	8 (5)
Small (600 to 2,499) (n = 276)	0 (0)	21 (20)	48 (25)	31 (14)
All districts (600 or more) (n = 1,175)	2 (2)	20 (11)	65 (13)	12 (8)

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[*] Among districts serving private school students in which some private schools do not elect to have their students participate, and in which funds are initially set aside to serve students in all private schools.

[**] This category includes funds that are retained by the state and never forwarded to the district; however, we have no further information on the disposition of these funds.

Table A-IV-3

CHANGE IN PROPORTION OF FUNDS AVAILABLE TO SERVE STUDENTS IN PRIVATE SCHOOLS, FROM ANTECEDENT PROGRAMS TO CHAPTER 2 (1984-85 SCHOOL YEAR), BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n) (Enrollment Range)	Percentage of districts* in which the proportion of funds available to serve students in private schools: Increased	Stayed the same	Decreased
Very large (25,000 or more) (n = 116)	57 (5)	43 (5)	0 (0)
Urban (n = 63)	70 (7)	30 (7)	0 (0)
Suburban (n = 53)	42 (8)	58 (8)	0 (0)
Large (10,000 to 24,999) (n = 336)	33 (6)	64 (6)	2 (1)
Medium (2,500 to 9,999) (n = 1,241)	25 (4)	70 (4)	5 (2)
Small (600 to 2,499) (n = 1,441)	23 (6)	75 (6)	2 (1)
All districts (600 or more) (n = 3,134)	26 (4)	71 (4)	3 (1)

---

*Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

Table A-V-1

COMPARISON OF SERVICES TO PUBLIC AND PRIVATE SCHOOL STUDENTS

(Standard error values are in parentheses)

Type of Activity	Percentage of districts* in which each activity has been supported by Chapter 2 funds in the last 3 years for... Public school students (n = 3,035 districts)	Private school students (n = 2,990 districts)
Computer applications	88 (2)	68 (5)
Other instructional materials and equipment	80 (5)	92 (2)
Curriculum or new program development	37 (5)	22 (5)
Student support services	24 (4)	9 (4)
Instructional programs	24 (3)	6 (2)
Staff development	39 (3)	11 (2)

---

* Among districts (with enrollment of at least 600) with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

Table A-V-2

DISTRICT GUIDANCE TO PRIVATE SCHOOL OFFICIALS REGARDING THE USE OF CHAPTER 2 FUNDS FOR THEIR STUDENTS

(Standard error values are in parentheses)

Type of Guidance	Percentage of districts* in which guidance is provided
Chapter 2...	n = 2,897
Can be used only for secular purposes**	32 (6) (n = 2,888)
Cannot pay for personnel	31 (5)
Can be used only for books, materials, equipment	39 (6)
Has to be used for the same things as provided to private school students under antecedent programs	11 (4)
Has to be used for the same things as provided to public school students under Chapter 2	38 (6)
District has not provided any particular guidance	14 (4)

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[*] Among districts (with enrollment of at least 600) with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

[**] Only in districts that have one or more religious schools with students participating in Chapter 2.

Table A-V-3

COMPARISON OF CHAPTER 2 SERVICES TO PUBLIC AND PRIVATE SCHOOL STUDENTS AT COMPARABLE LEVELS OF FUNDING

(Standard error values are in parentheses)

	Percentage of districts in which each activity has been supported by Chapter 2 funds for...	
Type of Activity	Public school students (only in districts with no more than $7,500 available for public school Chapter 2 services) (n = 11,749 districts)	Private school students in all districts serving private school students* (n = 2,991 districts)
Computer applications	67 (7)	68 (5)
Other instructional materials and equipment	74 (7)	92 (2)
Curriculum or new program development	19 (3)	22 (5)
Student support services	11 (2)	9 (4)
Instructional programs	13 (2)	6 (2)
Staff development	14 (7)	11 (2)

---

* Districts with at least 600 students.

Table A-VI-1

BURDEN ASSOCIATED WITH ADMINISTERING CHAPTER 2 SERVICES FOR PRIVATE SCHOOL STUDENTS, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

District Size (n) (Enrollment Range)	Percentage of districts* indicating "somewhat" or "very" burdensome	Mean* burden rating**
Very large (25,000 or more) (n = 141)	56 (4)	2.7 (.07)
Urban (n = 69)	65 (6)	2.8 (.09)
Suburban (n = 72)	50 (5)	2.5 (.09)
Large (10,000 to 24,999) (n = 414)	47 (5)	2.4 (.09)
Medium (2,500 to 9,999) (n = 1,707)	40 (4)	2.3 (.06)
Small (600 to 2,499) (n = 1,905)	36 (8)	2.2 (.18)
All districts (600 or more) (n = 4,167)	40 (5)	2.3 (.11)

---

* Among districts with one or more eligible private schools, and in which the private school student component is administered at the district level.

** Based on a 4-point burden scale: 1 = not at all; 2 = not very; 3 = somewhat; 4 = very. Midpoint on burden scale = 2.5.

Table A-VI-2

PROBLEMS DISTRICTS ENCOUNTER
ADMINISTERING SERVICES FOR PRIVATE SCHOOL STUDENTS, BY SIZE OF DISTRICT

(Standard error values are in parentheses)

	Percentage of Districts Encountering Problems With Respect to...				
District Size (n/n)+ (Enrollment Range)	Notification/ consultation*	Paperwork*	Monitoring**	Unreimbursed administrative costs**	Percentage of districts encountering no problems with the private school student component*
Very large (25,000 or more) (n = 142/136)	33 (4)	48 (4)	29 (4)	22 (4)	30 (4)
Urban (n = 72/71)	35 (6)	58 (5)	27 (6)	22 (5)	20 (5)
Suburban (n = 70/65)	32 (6)	38 (6)	31 (7)	24 (5)	43 (5)
Large (10,000 to 24,999) (n = 408/340)	39 (5)	38 (5)	30 (5)	25 (5)	36 (4)
Medium (2,500 to 9,999) (n = 1,627/1,303)	25 (3)	24 (3)	14 (3)	16 (3)	57 (4)
Small (600 to 2,499) (n = 1,864/1,207)	20 (6)	16 (6)	16 (9)	3 (2)	65 (7)
All districts (600 or more) (n = 4,041/2,986)	24 (4)	22 (4)	17 (5)	12 (2)	57 (4)

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*Among districts with eligible private schools, and in which the private school student component is administered at the district level.

**Among districts with one or more private schools with students participating in Chapter 2, and in which the private school student component is administered at the district level.

+ First value corresponds to columns 1, 2, and 5; second value corresponds to columns 3 and 4.

Appendix B

LIST OF ANTECEDENT PROGRAMS

Appendix B

LIST OF ANTECEDENT PROGRAMS CONSOLIDATED INTO THE CHAPTER 2 BLOCK GRANT

	Program Name	Authorization
1.	Basic Skills Improvement (Basic Grant) - Parent Participation - Out of School Program	Title II, ESEA
2.	Metric Education	Part B, Title III, ESEA
3.	Arts in Education	Part C, Title III, ESEA
4.	Preschool Partnership Programs	Part D, Title III, ESEA
5.	Consumer Education	Part E, Title III, ESEA
6.	Youth Employment	Part F, Title III, ESEA
7.	Law-Related Education	Part G, Title III, ESEA
8.	Environmental Education	Part H, Title III, ESEA
9.	Health Education	Part I, Title III, ESEA
10.	Correction Education	Part J, Title III, ESEA
11.	Dissemination of Information	Part K, Title III, ESEA
12.	Biomedical Sciences	Part L, Title III, ESEA
13.	Population Education	Part M, Title III, ESEA
14.	International Cultural Understanding	Part N, Title III, ESEA
15.	School Library Resources	Part B, Title IV, ESEA
16.	Support & Innovation	Part C, Title IV, ESEA
17.	Guidance & Counseling	Part D, Title IV, ESEA
18.	Strengthening State Agencies	Part B, Title V, ESEA
19.	Emergency School Aid (1) Basic Grants to LEAs - New - Continuation	Title VI, ESEA (formerly ESAA)

Program Name	Authorization
(2) Grants to Nonprofit Organizations - New - Continuation	
(3) Magnet Schools - New - Continuation	
(4) Special Projects - Planning Grants (new) - Preimplementation - Out-of-Cycle Grants - Special Discretionary Grants - SEA Grants - Arts	
20. Community Schools - LEA - SEA - Institutions of Higher Education - Nonprofit Organizations	Title VIII, ESEA
21. Gifted & Talented - Statewide Planning - Professional Development - Model Demonstration Projects	Part A, Title IX, ESEA
22. Educational Proficiency	Part B, Title IX, ESEA
23. Safe Schools	Part D, Title IX, ESEA
24. Ethnic Heritage	Part E, Title IX, ESEA
25. Teacher Corps - 1978 Program - 1979 Program	Part A, Title V, HEA
26. Teacher Centers - New - Continuation	Part B, Title V, HEA
27. Follow Through - LEAs (Compensatory Education) - Sponsors - Resource Centers	Part B, Head Start & Follow Through Act (phase in to Chapter 2)
28. Precollege Science Teacher Training	Section 3(a)(1), National Science Foundation Act
29. Career Education	Career Education Incentive Act

Program Name	Authorization
30. Alcohol & Drug Abuse Education	Alcohol & Drug Abuse Act
31. Cities in Schools	Authorization uncertain
32. Push for Excellence	Authorization uncertain

Abbreviations

ESEA - Elementary and Secondary Education Act of 1965, as amended in 1978

ESAA - Emergency School Aid Act (part of ESEA)

HEA - Higher Education Act